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Attorneys for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

STACIA STINER, et al., on behalf of themselves  
 and all others similarly situated,

Plaintiffs,

vs.

BROOKDALE SENIOR LIVING, INC.;  
 BROOKDALE SENIOR LIVING  
 COMMUNITIES, INC.; et al.,

Defendants.

Case No. 4:17-cv-03962-HSG (LB)

**DECLARATION OF GUY B. WALLACE IN  
 SUPPORT OF PLAINTIFFS' MOTION  
 FOR CLASS CERTIFICATION**

Date: May 26, 2022  
 Time: 2:00 p.m.  
 Place: Courtroom 2  
 Judge: Hon. Haywood S. Gilliam, Jr.

**REDACTED**

1 I, Guy B. Wallace, declare:

2 1. I am a senior partner at the law firm of Schneider Wallace Cottrell Konecky LLP  
3 (“Schneider Wallace”). I am a member in good standing of the Bar of the State of California. I am  
4 co-lead counsel of record with Gay Crosthwait Grunfeld, Kathryn A. Stebner and David T. Marks for  
5 Plaintiffs and the proposed classes in the above-captioned matter (collectively “Plaintiffs”). I have  
6 personal knowledge of the facts set forth in this Declaration and could and would testify competently to  
7 them.

8 2. This Declaration is submitted in support of Plaintiffs’ Motion for Class Certification in  
9 the above-captioned matter.

### 10 **QUALIFICATIONS AND PROFESSIONAL BACKGROUND**

11 3. I graduated from Harvard Law School in 1993. From 1993 to 1994, I was a Skadden  
12 Fellow at the Disability Rights Education and Defense Fund. From 1994 to 1998, I was a Skadden  
13 Fellow and then Staff Attorney at Disability Rights Advocates. Between March 1998 and June 2000, I  
14 was a Staff Attorney at the Legal Aid Society of San Francisco / Employment Law Center and served as  
15 head of the disability rights practice. I became a partner in the firm now known as Schneider Wallace  
16 Cottrell Konecky LLP in June 2000.

17 4. During my twenty-seven (27) years of practice I have had extensive experience in class  
18 actions and other complex litigation. In particular, I have specialized in disability civil rights class  
19 actions as well as wage and hour, employment, and other consumer class action matters. I have served  
20 as lead counsel, co-lead counsel, or class counsel in more than thirty class actions, and have done so  
21 through trial and on appeal. These cases have included, among many others, the following:

- 22 • Nevarez v. Forty Niners Football Co., LLC, Case No. 5:16-cv-07013-LHK (SVK): lead  
23 counsel in systemic, disability access class action involving claims under Title II and Title  
24 III of the Americans with Disabilities Act of 1990. This case settled for more than \$15  
25 million in injunctive relief and \$24 million in class damages, the largest class damages  
26 settlement regarding disability access to a public accommodation in United States history.
- 27 • Willits v. City of Los Angeles, Case No. 10-05782 CBM (RZx) (C.D. Cal.): lead counsel in  
28 systemic, disability access class action involving claims under Title II of the Americans with

Disabilities Act of 1990. This case settled for \$1.37 billion in injunctive relief remedying physical access barriers to persons with mobility disabilities in the City's pedestrian rights of way, the largest systemic disability access settlement in United States history.

- Carnes v. Atria Senior Living, Inc., Case No. 3:14-cv-02727-VC (N.D. Cal.): co-lead counsel in statewide class action alleging violations of California's Consumer Legal Remedies Act, California's unfair competition statute, and the Financial Elder Abuse statute on behalf of assisted living facility residents. This case settled for \$6.3 million and changes in the defendant's policies.
- Winans v. Emeritus Corp., Case No. 3:13-cv-03962-SC (N.D. Cal.): co-lead counsel in statewide class action alleging violations of California's Consumer Legal Remedies Act, California's unfair competition statute, and the Financial Elder Abuse statute on behalf of assisted living facility residents. This case settled for \$13.5 million and significant changes in the defendant's policies.
- Shemaria v. County of Marin, Case No. CV 082718 (Marin County, Sup. Ct.): lead counsel in disability access class action involving claims under Title II of the Americans with Disabilities Act of 1990 and California Government Code § 11135, *et seq.* This case settled for \$15 million in injunctive relief remedying physical access barriers to persons with mobility disabilities in the County's Civic Center, parks, swimming pools, libraries, and pedestrian rights of way.
- Williams v. H&R Block, Case No. RG08366506 (Alameda County, Sup. Ct., Complex Cases Dept.): co-lead counsel in statewide wage and hour class action on behalf of managers at H&R Block alleging misclassification and failure to pay overtime hours and all hours worked. This case settled for \$6.4 million.
- Holloway v. Best Buy, Case No. C-05-5056 PJH (MEJ) (N.D. Cal.): class counsel in Title VII pattern or practice class action settlement regarding race and gender discrimination. This case settled for injunctive relief regarding the company's policies, procedures and practices regarding promotions and compensation.

- 1       • Rosa v. Morrison Homes, Case No. 373059 (Stanislaus County, Sup. Ct., Complex Cases  
2       Dept.): co-lead counsel in novel construction defect class action involving 400 homes. This  
3       case settled for \$5.9 million including repairs to the subject homes.
- 4       • Wren v. RGIS, Case No. C-06-05778 JCS (N.D. Cal.): lead counsel in wage and hour  
5       national class action involving California, Washington, Oregon, Illinois and federal FLSA  
6       violations. This class included over 62,000 RGIS employees. This case settled for \$27  
7       million in addition to injunctive relief regarding company policies and procedures regarding  
8       payment for all employee hours worked.
- 9       • Chau v. CVS, Case No. BC349224 (Los Angeles County, Sup. Ct., Complex Cases Dept.):  
10      co-lead counsel in wage and hour settlement on behalf of statewide class of pharmacists  
11      alleging meal and rest period violations as well as overtime pay violations. This case settled  
12      for \$19.75 million.
- 13      • Satchell v. FedEx Express, Inc., Case No. C-03-2659 SI (N.D. Cal.): co-lead counsel in Title  
14      VII pattern or practice class action regarding race discrimination. This case settled for over  
15      \$38 million and injunctive relief regarding the company's employment policies, procedures,  
16      and practices.
- 17      • Cherry v. City College of San Francisco, Case No. C-04-4981 WHA (N.D. Cal.): lead  
18      counsel in class action regarding physical and programmatic access to the San Francisco  
19      Community College District on behalf of students with mobility disabilities. This case led to  
20      a Stipulated Judgment against the College that resulted in the expenditure of over \$20  
21      million in injunctive relief remedying physical access barriers to persons with mobility  
22      disabilities in numerous campuses of City College.
- 23      • Lopez v. San Francisco Unified School District, Case No. C-99-3260 SI (N.D. Cal.): lead  
24      counsel in class action regarding physical and programmatic access to the San Francisco  
25      public schools on behalf of students and adults with mobility and/or vision disabilities. This  
26      case resulted in a Stipulated Judgment against the school district requiring over \$400 million  
27      in injunctive relief remedying physical access barriers to persons with mobility disabilities in  
28      100 of the district's schools.



- 1 • Lenahan v. Sears, Roebuck & Co., Case No. 3-02-CV-000045 (SRC) (TJB) (D.N.J.): class  
2 counsel in wage and hour collective action challenging failure to pay employees for all hours  
3 worked as required by the Fair Labor Standards Act. This case settled for \$15 million.
- 4 • Singleton v. Regents of the University of California, Case No. 807233-1 (Alameda County,  
5 Sup. Ct., Complex Cases Dept.): class counsel in employment discrimination action against  
6 Lawrence Livermore National Laboratory for gender discrimination against women in  
7 promotion, compensation and other terms and conditions of employment. This case settled  
8 for \$10.6 million and injunctive relief regarding the Laboratory's employment policies,  
9 procedures, and practices.
- 10 • Bates v. United Parcel Service, Case No. C-99-02216 TEH, 204 F.R.D. 440 (N.D. Cal.  
11 2001): class counsel on behalf of nationwide class of deaf and hard of hearing employees of  
12 UPS. This case settled for \$5.8 million.
- 13 • Siddiqi v. Regents of the University of California, Case No. C 99-0970 SI, 2000 WL  
14 33190435, 81 F. Supp. 2d 972 (N.D. Cal. 1999): lead counsel in class action against two  
15 campuses of the University of California for failing to adopt and implement appropriate  
16 policies and procedures regarding auxiliary aids and services for students who are deaf or  
17 hard of hearing as required by the Americans with Disabilities Act. This case settled for  
18 injunctive relief including changes to the Universities' policies, procedures and practices for  
19 accommodating students who are deaf or hard of hearing, as well as the remediation of  
20 communications access barriers in University lecture halls and classrooms through the  
21 installation of assistive listening systems and other access equipment and features.
- 22 • Weissman v. Trustees of the California State University, Case No. Civ. 97-02326 MMC  
23 (MEJ), 1998 U.S. Dist. LEXIS 22615, 1999 WL 1201809 (N.D. Cal.): co-lead counsel in  
24 class action on behalf of students and faculty members with mobility and/or visual  
25 impairments against the San Francisco State University for denial of programmatic access.  
26 This case settled for \$5 million in injunctive relief requiring the removal of physical access  
27 barriers to persons with mobility and/or visual impairments at San Francisco State  
28 University.

- 1 • Gustafson v. Regents of the University of California, Case No. C-97-4016 BZ (N.D. Cal.):  
2 co-lead counsel in class action on behalf of students with mobility and/or vision disabilities  
3 against the Regents of the University of California for denial of physical and programmatic  
4 access at the University of California at Berkeley campus.
- 5 • C.P. v. City and County of San Francisco, Case No. 976437 (San Francisco County, Sup.  
6 Ct.): lead counsel in class action challenge to policy cutting off childcare benefits to foster  
7 children with disabilities. This case was resolved with the entry of a permanent injunction  
8 against the policy after the plaintiffs successfully sought a TRO from the superior court.
- 9 • Guckenberger v. Boston University, 974 F. Supp. 106 (D. Mass. 1997); 957 F. Supp. 306  
10 (D. Mass. 1997): class counsel in class action on behalf of students with learning disabilities  
11 against a private university for policies limiting access to reasonable accommodations. This  
12 case was tried with plaintiffs obtaining substantial changes in defendants' policies and  
13 damages for the named plaintiffs.
- 14 • Thomas v. BASS, Case No. 733496-8 (Alameda County, Sup. Ct.): class counsel in class  
15 action on behalf of all BASS Tickets patrons in Northern California with mobility  
16 disabilities denied equal access to defendant's ticket selling services. This action settled  
17 with plaintiffs obtaining changes in defendant's policies and damages.
- 18 • Putnam v. Oakland Unified School District, Case No. Civ. 93-3772 CW, 1995 US Dist.  
19 LEXIS 22122, 1995 WL 873734 (N.D. Cal.): class counsel in class action against large  
20 urban school district under state and federal law for the District's failure to make its  
21 programs and facilities accessible to students with disabilities. Plaintiffs' motion for  
22 summary judgment was granted. The case was settled requiring the defendant to make at  
23 least 25 of its schools fully accessible.

24 5. I serve as a member of the Board of Directors of the San Francisco Trial Lawyers  
25 Association. I have served as a member of the Board of Directors of the Bar Association of San  
26 Francisco. I have also served on the Board of Directors of Disability Rights California, a section  
27 501(c)(3) organization committed to protecting the civil rights of persons with disabilities. I am a  
28 member of the bar of the Ninth Circuit Court of Appeals and of the United States Supreme Court. I

1 have served as counsel in both of those courts on matters relating to employment and disability civil  
 2 rights. I have been named a “Super Lawyer” in the area of civil rights by Northern California Super  
 3 Lawyers magazine for the past ten years. I received the San Francisco Trial Lawyers Association’s  
 4 Civil Justice Award in 2017.

5 6. The firm of Schneider Wallace Cottrell Konecky LLP has an extensive practice in the  
 6 areas of civil rights, wage and hour violations, disability civil rights (including both employment  
 7 discrimination and access to public entities and public accommodation), and actions brought on behalf  
 8 of consumers under both federal and state law. Class action and other complex litigation is the major  
 9 focus of the firm. Todd Schneider founded the firm in 1993. Schneider Wallace employs between 35  
 10 and 40 attorneys and has acted or is acting as class counsel in many cases. The firm has represented  
 11 plaintiffs at all levels including the federal and state trial courts, the California Courts of Appeal, the  
 12 California Supreme Court, the Ninth Circuit Court of Appeals, and the United States Supreme Court.

### 13 **ADEQUACY OF PLAINTIFFS’ COUNSEL**

14 7. Proposed class counsel have extensive experience with class action lawsuits generally,  
 15 and in litigation under the Americans with Disabilities Act of 1990 (ADA), California’s Unruh Civil  
 16 Rights Act, Cal. Civ. Code §§ 51, *et seq.*, California’s Consumer Legal Remedies Act (CLRA), Cal.  
 17 Civ. Code § 1750 *et seq.*, and California’s Unfair Competition Law (UCL), Cal. Bus. & Prof. Code  
 18 § 17200 *et seq.*, regarding elder abuse and elder financial abuse.

19 8. Co-counsel Gay C. Grunfeld is a partner of the law firm of Rosen Bien Galvan  
 20 & Grunfeld, LLP and was admitted to the California Bar in 1985. As described more fully in her  
 21 declaration in support of this Motion, Ms. Grunfeld has extensive experience in class action litigation  
 22 and has repeatedly been appointed class counsel by courts in the Northern and Eastern Districts of  
 23 California. Ms. Grunfeld represents thousands of incarcerated people with disabilities in the state of  
 24 California in the class action *Armstrong v. Newsom*, C 94-2307 CW (N.D. Cal.). Ms. Grunfeld has won  
 25 appellate decisions and district court orders and written and lectured on the rights of people with  
 26 disabilities under the Americans with Disabilities Act. Ms. Grunfeld has repeatedly been named by the  
 27 *San Francisco Daily Journal* as one of the top 100 lawyers in California, and serves as an elected  
 28

1 member of the Conference Executive Committee of the United States Court of Appeals for the Ninth  
2 Circuit.

3 9. Co-counsel Kathryn Stebner has been practicing law for over 30 years. Ms. Stebner has  
4 been prosecuting elder abuse cases since 1987, and has practiced solely in this area for approximately  
5 twenty years. She has been involved with California Advocates for Nursing Home Reform (CANHR)  
6 since 1987. Since January 28, 2002, she has sat on the California Bar-sanctioned lawyer referral panel  
7 of CANHR for Elder and Dependent Abuse Civil Protection Act (EADCPA) cases. She has experience  
8 in class action matters and has been involved as counsel for the plaintiffs in the litigation of at least  
9 sixteen other class action cases, including nine class action cases brought for understaffing violations in  
10 skilled nursing facilities. She also has experience representing plaintiffs in five class action cases  
11 against owners of assisted living facilities alleging violations of the CLRA, UCL, and elder financial  
12 abuse statute. She has lectured on numerous occasions regarding elder abuse cases, including several  
13 lectures on class action law and the use of Business & Professions Code section 17200 and the CLRA in  
14 Elder Abuse actions. Ms. Stebner has also testified on several occasions before the California  
15 Assembly and Senate on bills pertaining to elder abuse and elder rights. She is a Past-President of the  
16 San Francisco Trial Lawyers' Association (SFTLA), has been on the Board of Governors of the  
17 Consumer Attorneys of California (CAOC) for over ten years and is currently its Second Vice-  
18 President, and she has tried in excess of 20 trials and arbitrations. Among numerous other publications,  
19 she is the author of two chapters on Elder Abuse for the Continuing Education of the Bar (CEB), as well  
20 as the book *Elder Law Litigation Strategies: Leading Lawyers on Understanding the Changing*  
21 *Landscape of Elder Law Litigation and Its Effect on Client Needs*.

22 10. Co-counsel David T. Marks is the founding partner of the law firm of Marks Balette  
23 Giessel & Young, P.L.L.C. He has been licensed to practice law in Texas since 1978. He also holds  
24 licenses in Tennessee, Kentucky, North Carolina, Oklahoma, and Arkansas. His pro hac vice  
25 application to appear in this action was granted by this Court on June 17, 2021. (Dkt. No. 266).  
26 Mr. Marks has spent the bulk of his professional legal career handling civil and criminal nursing home  
27 and elder abuse cases rooted in defendants' failure to provide sufficient levels of staff to meet the basic  
28 needs of residents. He has served as the Chairman of the nursing home litigation group for ATLA,

1 served as an expert witness on nursing home related issues before the United States Senate and the  
 2 Texas House of Representatives, and authored over 30 articles and manuals on nursing home neglect  
 3 and litigation. Mr. Marks has served as lead trial counsel in some of the largest verdicts in the United  
 4 States arising out of the mistreatment and exploitation of elderly residents in long term care facilities  
 5 and from chronic understaffing by corporate long-term operators. In 1997, he obtained a jury verdict  
 6 and judgment against the largest nursing home operator in the United States, Beverly Enterprises, Inc.,  
 7 for \$83 million [resulting in a \$13 million settlement]. In 2004, he prosecuted a case against Zurich  
 8 Insurance Co. in the United States Bankruptcy Court on behalf of the Creditors Committee for a  
 9 bankrupt nursing home chain. The court entered judgment against Zurich finding it was the equitable  
 10 partner of Senior Living Properties (debtor) and, therefore, liable for \$528 million in debt [resulting in  
 11 \$56 million settlement]. In 2006, he obtained a jury verdict and judgment against Summit Care  
 12 Corporation in the amount of \$160 million arising out of the mistreatment of an elderly man [resulting  
 13 in \$ 13.15 million settlement]. More recently, in 2017, he prosecuted a class action case against Golden  
 14 Living (GGNSC Holdings, LLC) for understaffing and violations of the Arkansas Deceptive Trade  
 15 Practices Act in twelve facilities owned and operated by Golden Living in Arkansas. After extensive  
 16 depositions and trial proceedings, the case settled (one day prior to jury selection) for \$71 million.

17 11. Further detail on the qualifications and experience of co-counsel and proposed class-  
 18 counsel Ms. Grunfeld, Ms. Stebner, and Mr. Marks are set forth in their separate Declarations filed in  
 19 support of this motion.

#### 20 **THIS ACTION IS SUITABLE FOR CLASS CERTIFICATION**

21 12. I believe the class of Plaintiffs in this case is far too numerous for joinder to be  
 22 practicable. In this case I consider a class action superior to any other method of adjudication because  
 23 the risk of substantial prejudice from separate actions is high, and because numerous common questions  
 24 of law and/or fact are presented. Without certification, Plaintiffs may only pursue numerous individual  
 25 lawsuits, creating undue hardship on the various Plaintiffs, Defendants, and the Court. Certification, I  
 26 believe, would avoid the prejudice present in separate actions by eliminating inconsistent decisions and  
 27 affording all class members relief through a single proceeding. Because of the efficiency of the class  
 28

1 action mechanism in this regard, I believe that class certification would be in the best interests of  
2 Plaintiffs, Defendants, and the Court.

3 13. Plaintiffs' counsel are committed to the full preparation of this case through the  
4 performance of any necessary and reasonable discovery, and are willing to take this case to trial should  
5 that become necessary. Our firms are committed to acting in the best interests of the putative classes,  
6 and understand our duties in that regard under applicable federal law.

7 **DOCUMENTARY EVIDENCE SUBMITTED IN SUPPORT OF CLASS CERTIFICATION**

8 14. Attached hereto as Exhibit 1 is a true and correct copy of a document entitled  
9 "Brookdale/Emeritus Merger Talking Points," which was produced by Defendants in this action in  
10 response to Plaintiffs' requests for production of documents, Bates numbered BKD0205442 through  
11 BKD0205443.

12 15. Attached hereto as Exhibit 2 is a true and correct copy of Defendants' Supplemental  
13 Responses to Plaintiff Helen Carlson's Interrogatories, Set One, dated April 23, 2021, in which, in  
14 response to Interrogatory No. 16, at pages 46 through 50, Brookdale identified ninety (90) assisted  
15 living facilities in California that it has leased, owned, operated and/or managed over the course of the  
16 Class Period.

17 16. Attached hereto as Exhibit 3 is a true and correct copy of Defendants' Supplemental  
18 Responses to Plaintiff Stacia Stiner's Interrogatories, Set One, in which, in response to Interrogatory  
19 No. 9, at pages 4-5, Defendants identified twenty-seven (27) of the California assisted living facilities  
20 that it owned operated or managed during the class period that were constructed for first occupancy  
21 after January 26, 1993.

22 17. Attached as Exhibit 4 is a true and correct copy of an email message dated March 12,  
23 2020, from Defendants' former counsel, Jeffrey Kopczynski, to my co-counsel Mark T. Johnson,  
24 announcing that any further inspections of Brookdale's facilities that had been noticed by Plaintiffs'  
25 counsel pursuant to Fed. R. Civ. 34 were cancelled due to the coronavirus pandemic and the state of  
26 emergency that had been declared as a result of the pandemic. Prior to that time, Plaintiffs' disability  
27 access experts had inspected 52 of Defendants' California facilities and had noticed others that were to  
28 be scheduled by the parties.

1           18. Attached hereto as Exhibit 5 is a true and correct copy of a set of documents produced by  
 2 Defendants in response to Plaintiffs' requests for production of documents in this action, Bates  
 3 numbered BKD1205388 through BKD1205414, that includes Brookdale's 2020 Fleet Safety policy, at  
 4 BKD1205390 through BKD1250398. The policy states, at p. 5, BKD1205394: [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED].” At the same page, the policy  
 7 states: “[REDACTED]  
 8 [REDACTED]”

9           19. Attached hereto as Exhibit 6 is a true and correct copy of Brookdale's 2019 Fleet Safety  
 10 Policy. This document was produced by Defendants in response to Plaintiffs' requests for production of  
 11 documents in this action with Bates numbers BKD2837452 through BKD2837458, and was marked as  
 12 Deposition Exhibit 236. At BKD2837455-56 this policy states: [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED] At the same page, the policy states: “[REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED].”

18           20. Attached hereto as Exhibit 7 is a true and correct copy of Brookdale's 2017 Fleet Safety  
 19 Policy, which was produced by Defendants in response to Plaintiffs' requests for production of  
 20 documents in this action with Bates numbers BKD0002901 through BKD0002907 and was also marked  
 21 as Deposition Exhibit 156. At BKD0002904, that policy states: [REDACTED]  
 22 [REDACTED]”

23           21. Attached hereto as Exhibit 8 is a true and correct copy of Brookdale's 2020 Emergency  
 24 Manual, which was produced by Defendants in response to Plaintiffs' requests for production of  
 25 documents with Bates numbers BKD1569794 through BKD1569928, and was marked as Deposition  
 26 Exhibit 227 in this action. At BKD1569811, the Emergency Manual states that [REDACTED]  
 27 [REDACTED]  
 28



1 [REDACTED] At BKD1569880, the manual states that [REDACTED]

2 [REDACTED]”

3 22. Attached hereto as Exhibit 9 is a true and correct copy of Brookdale’s Emergency and  
4 Disaster Plan for its Tracy facility, which was produced by Defendants in response to Plaintiffs’  
5 requests for production of documents in this action, Bates numbered BKD1867468 through  
6 BKD1867476.

7 23. Attached hereto as Exhibit 10 is a true and correct copy of Brookdale’s Emergency and  
8 Disaster Plan for its Scotts Valley facility, which was produced by Defendants in response to Plaintiffs’  
9 requests for production of documents in this action, Bates numbered BKD2179317 through BKD  
10 2179325.

11 24. Attached hereto as Exhibit 11 is a true and correct copy of a document that includes  
12 Brookdale’s contract with Bus Finders, dated March 22, 2016, [REDACTED]  
13 [REDACTED]  
14 [REDACTED]” and accompanying documents. This document was produced by  
15 Defendants in this action in response to Plaintiffs’ requests for production of documents with Bates  
16 numbers BKD1599043 through BKD1599061. The contract appears at BKD1599043 through  
17 BKD1599057.

18 25. Attached hereto as Exhibit 12 is a true and correct copy of correspondence dated  
19 March 3, 2017 from Guy Wallace to Shawn Cull, Brookdale’s former Executive Director for Brookdale  
20 San Ramon and Chad C. White, Brookdale’s General Counsel, in which they were asked to make  
21 reasonable accommodations for residents of Brookdale’s California facilities with disabilities by  
22 increasing the staff at those facilities. This document was marked as Deposition Exhibit 224 in this  
23 action. Defendants have never responded substantively to this correspondence or otherwise agreed to  
24 make the accommodations requested.

25 26. Attached hereto as Exhibit 13 is a true and correct copy of Brookdale’s 696-page 2021  
26 Policy and Procedure Manual. This document was produced by Defendants in this action in response to  
27 Plaintiffs’ requests for production of documents with Bates numbers BKD2874761 through  
28 BKD2875456, and was marked as Deposition Exhibit 128.

1           27. Attached hereto as Exhibit 14 is a true and correct copy of Brookdale's Resident  
2 Evaluation Process Policy, CS-70-2, Bates numbered BKD2874857. This document was produced by  
3 Defendants in this action in response to Plaintiffs' requests for production of documents, and was  
4 marked as Deposition Exhibit 102.

5           28. Attached hereto as Exhibit 15 is a true and correct copy of Brookdale's Service Plan  
6 Process Policy, CS-70-3, Bates numbered BKD2874858. This document was produced by Defendants  
7 in response to Plaintiffs' requests for production of documents in this action, and was marked as  
8 Deposition Exhibit 103.

9           29. Attached hereto as Exhibit 16 is a true and correct copy of Brookdale's Quick Reference  
10 Guide entitled "Using the Personal Service System (PSS) Online," Bates numbered BKD0005118  
11 through BKD0005131. This document was produced by Defendants in response to Plaintiffs' requests  
12 for production of documents in this action and was marked as Deposition Exhibit 282.

13           30. Attached hereto as Exhibit 17 is a true and correct copy of Brookdale's Personal Service  
14 Assessment and Personal Service Plan Interpretive Guidelines which was produced by Defendants in in  
15 this action in response to Plaintiffs' requests for production of documents with Bates Numbers  
16 BKD0005133 through BKD0005158 and was marked as Deposition Exhibit 28.

17           31. Attached hereto as Exhibit 18 is a true and correct copy of an email dated August 25,  
18 2016, from Mary Sue Patchett, Brookdale's Executive Vice President for Community and Field  
19 Operations, to Brookdale's community managers at all levels, with the subject line "[REDACTED]  
20 [REDACTED]" This document was produced by Defendants in response to Plaintiffs' requests  
21 for production of documents in this action with Bates numbers BKD1723416 through BKD1723417.  
22 At BKD1723417, Ms. Patchett describes [REDACTED]." At  
23 BKD1723416, [REDACTED] she states: "[REDACTED]  
24 [REDACTED]  
25 [REDACTED]"

26           32. Attached hereto as Exhibit 19 is a true and correct copy of an email dated October 19,  
27 2016 from Mary Sue Patchett, Executive Vice President of Community and Field Operations, with the  
28 subject line "[REDACTED]." This document identifies [REDACTED]

1 [REDACTED]  
 2 [REDACTED]. It was produced by Defendants in response to Plaintiffs' requests for production of  
 3 documents in this action with Bates numbers BKD1762135 through BKD1762136.

4 33. Attached hereto as Exhibit 20 is a true and correct copy of a Brookdale Slide  
 5 Presentation entitled "Welcome to Service Alignment Overview," identified as [REDACTED],  
 6 which, at BKD2522658, describes [REDACTED]  
 7 [REDACTED]" This document was produced by Defendants in response to Plaintiffs' requests for  
 8 production of documents in this action with Bates numbers BKD2522657 through BKD 2522688 and  
 9 was marked as Deposition Exhibit 164.

10 34. Attached hereto as Exhibit 21 is a true and correct copy of a Brookdale slide presentation  
 11 entitled "Welcome to Service Alignment Assignment Plans," identified as [REDACTED]  
 12 [REDACTED]. This document was produced by Defendants in response to Plaintiffs' requests for  
 13 production of documents in this action with Bates numbers BKD2518713 through BKD2518734.

14 35. Attached hereto as Exhibit 22 is a true and correct copy of a Brookdale slide presentation  
 15 entitled "Welcome to Service Alignment Labor Reports and Benchmarks," identified as  
 16 [REDACTED]. This document was produced by Defendants in response to  
 17 Plaintiffs' requests for production of documents in this action with Bates numbers BKD2522711  
 18 through BKD2522731, and was marked as Deposition Exhibit 166. At Bates No. 2522712, this  
 19 document states: "[REDACTED]"

20 [REDACTED] At Bates  
 21 No. BKD2522727, this document states: "[REDACTED]"  
 22 [REDACTED]  
 23 [REDACTED]."

24 36. Attached hereto as Exhibit 23 is a true and correct copy of a Brookdale slide presentation  
 25 entitled "Service Alignment / Service Alignment Overview." This document was produced by  
 26 Defendants in response to Plaintiffs' requests for production of documents in this action with Bates  
 27 numbers BKD1840440 through BKD1840466, and was marked as Deposition Exhibit 31. At  
 28 BKD1840442 this document states: "[REDACTED]"

1 [REDACTED]  
2 [REDACTED]” At BKD1840445, the document states: “[REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]”

6 37. Attached hereto as Exhibit 24 is a true and correct copy of a Brookdale slide presentation  
7 entitled “Service Alignment: *Make Special Things Happen*” by Bill Cus, Divisional Director of Service  
8 Alignment. This document was produced by Defendants in response to Plaintiffs’ requests for  
9 production of documents in this action with Bates numbers BKD1918693 through BKD1918735. At  
10 BKD1918711 this document states: [REDACTED]

11 [REDACTED].” At BKD1918714, in describing  
12 [REDACTED], it states that the report “[REDACTED]

13 [REDACTED]  
14 [REDACTED]” On the same page, the document states that [REDACTED]  
15 [REDACTED] and [REDACTED]  
16 [REDACTED]

17 38. Attached hereto as Exhibit 25 is a true and correct copy of a Brookdale training  
18 presentation entitled “CCRC Expense Management for Community Directors,” dated October 2018,  
19 which was produced by Defendants in response to Plaintiffs’ requests for production of documents in  
20 this action with Bates numbers BKD2517624 through BKD2517666.

21 39. Attached hereto as Exhibit 26 is a true and correct copy of a Brookdale slide presentation  
22 for a Service Alignment meeting in Nashville dated June 5, 2018. This document was produced by  
23 Defendants in response to Plaintiffs’ requests for production of documents in this action with Bates  
24 numbers BKD2507632 through 2507651, and was marked as Deposition Exhibit 131.

25 40. Attached hereto as Exhibit 27 is a true and correct copy of a Brookdale slide presentation  
26 entitled “Service Alignment Process Improvement Plan – Clinical Q2 2017” which was produced by  
27 Defendants in response to Plaintiffs’ requests for production of documents in this action with Bates  
28 numbers BKD1890850 through BKD1890873.

1           41. Attached hereto as Exhibit 28 is a true and correct copy of a document produced by  
 2 Brookdale in response to Plaintiffs' requests for production of documents in this action entitled:  
 3 "Service Alignment Benchmarks: *Norms and Customization Descriptions*." This document was  
 4 produced with Bates numbers BKD2884686 through 2884690 and was marked as Deposition  
 5 Exhibit 283. At BKD2884686, the document states that it "[REDACTED]"

6 [REDACTED]  
 7 [REDACTED]  
 8           42. Attached hereto as Exhibit 29 is a true and correct copy of a document produced by  
 9 Defendants in this case in response to Plaintiffs' requests for production of documents entitled:  
 10 "Service Alignment Benchmark Setup and Community Customization Quick Reference Guide," Bates  
 11 numbered BKD1797431 through BKD1797437 and marked as Deposition Exhibit 132.

12           43. Attached hereto as Exhibit 30 is a true and correct copy of a document entitled "Request  
 13 for Advanced Customization: Exception to the Service Alignment (SA) Benchmark," which was  
 14 produced by Defendants in response to Plaintiffs' requests for production of documents in this action  
 15 with Bates number BKD2085462, and was marked as Deposition Exhibit 317. This document states

16 [REDACTED]  
 17 [REDACTED].  
 18           44. Attached hereto as Exhibit 31 is a true and correct copy of an email dated August 23,  
 19 2018, from Kevin Bowman to his [REDACTED]

20 [REDACTED]  
 21 [REDACTED]" This document was produced by Defendants in response to Plaintiffs'  
 22 requests for production of documents in this action with Bates number BKD2377314, and was marked  
 23 as Deposition Exhibit J.

24           45. Attached hereto as Exhibit 32 is a true and correct copy of a Brookdale email thread that  
 25 includes an email dated June 19, 2018 from Kevin Bowman to his District Directors of Operation in  
 26 which he states, at BKD1723871: [REDACTED]

27 [REDACTED] This document was produced by Defendants in  
 28

1 response to Plaintiffs' requests for production of documents in this action with Bates numbers  
2 BKD1723870 through 1723872, and was marked as Deposition Exhibit 284.

3 46. Attached hereto as Exhibit 33 is a true and correct copy of an email calendar invite dated  
4 June 15, 2015, from Brookdale employee Christopher Finn, Divisional Director of Service Alignment,  
5 stating that [REDACTED]

6 [REDACTED]  
7 [REDACTED] This document was produced by Defendants in response to Plaintiffs' requests for  
8 production of documents with Bates numbers BKD1847776 through BKD1847777 and was marked as  
9 Deposition Exhibit 255.

10 47. Attached hereto as Exhibit 34 is a true and correct copy of an email dated September 11,  
11 2018, from Jeffrey Toomer, a Brookdale District Director of Operations, in which he states, at  
12 BKD2069280: [REDACTED]

13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]” This document was produced by Defendants in response to Plaintiffs’  
16 requests for production of documents in this action with Bates numbers BKD2069280 through  
17 BKD2069281, and was marked as Deposition Exhibit 124.

18 48. Attached as Exhibit 35 is an email from Kevin Bowman dated November 1, 2016, in  
19 which he states [REDACTED]

20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]” This document was produced by Defendants in response to Plaintiffs' requests for  
23 production of documents in this action with Bates number BKD1625738, and was marked as  
24 Deposition Exhibit 136.

25 49. Attached hereto as Exhibit 36 is a true and correct copy of an email dated February 12,  
26 2018 from Kevin Bowman stating, at BKD1829289, that [REDACTED]

27 [REDACTED]” This  
28 document was produced by Defendants in response to Plaintiffs' requests for production of documents

1 in this action with Bates numbers BKD1829289 through BKD1829290 and was marked as Deposition  
2 Exhibit 285.

3 50. Attached hereto as Exhibit 37 is a true and correct copy of an email thread that includes  
4 an email dated September 3, 2015 from Christopher M. Belford, former President of Brookdale's West  
5 Division, with the subject line [REDACTED] Mr. Belford notes an [REDACTED]  
6 [REDACTED] at BKD2094927, and states at BKD2094928: [REDACTED]

7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED] This document was produced by Defendants in response to Plaintiffs' requests for production of  
10 documents in this action with Bates numbers BKD2094926 through 2094928 and was marked as  
11 Deposition Exhibit 257.

12 51. Attached hereto as Exhibit 38 is a true and correct copy of a Brookdale email thread that  
13 includes an email dated March 2, 2016 from Rhonda Dolcater, the Divisional Director of Service  
14 Alignment for Brookdale's West Division, to management staff at Brookdale's South Tarzana facility.  
15 In her email, which has the subject line "[REDACTED]," Ms. Dolcater states, at  
16 BKD1841083: [REDACTED]

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 This document was produced by Defendants in response to Plaintiffs' requests for production of  
21 documents in this action with Bates numbers BKD1841083 through BKD1841084.

22 52. Attached hereto as Exhibit 39 is a true and correct copy of a Brookdale email thread that  
23 includes an email dated March 23, 2016 from Rhonda Dolcater to the Executive Director of  
24 Brookdale's Scotts Valley facility in which Ms. Dolcater states at BKD1725845: "[REDACTED]"

25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]



1 This document was produced by Defendants in response to Plaintiffs' requests for production of  
2 documents in this action with Bates numbers BKD1725845 through BKD1725846 and was marked as  
3 Deposition Exhibit 261.

4 53. Attached hereto as Exhibit 40 is a true and correct copy of a Brookdale email dated  
5 August 2, 2016 from Brookdale employee Frankie Knighton to Sheila Garner, with the subject line  
6 [REDACTED].” Under the heading [REDACTED],” the  
7 email states, at BKD2642652: “[REDACTED]  
8 [REDACTED]” This document was produced by Defendants in response to  
9 Plaintiffs' requests for production of documents in this action with Bates numbers BKD2642652  
10 through BKD2642659 and was marked as Deposition Exhibit 262.

11 54. Attached hereto as Exhibit 41 is a true and correct copy of a Brookdale email dated  
12 January 19, 2017, from Steven G. Flynt, the Division President for the West Division at the time, to  
13 Sheila Garner and other Brookdale regional managers. The email is a [REDACTED]  
14 [REDACTED] and includes the statement: “[REDACTED]  
15 [REDACTED]  
16 [REDACTED].” This document was  
17 produced by Defendants in response to Plaintiffs' requests for production of documents in this action  
18 Bates number BKD2228040.

19 55. Attached hereto as Exhibit 42 is a true and correct copy of a Brookdale email thread that  
20 includes an email dated February 16, 2017 from Sheila Garner, Senior Regional Vice President of  
21 Operations for Brookdale's West Division, to several Brookdale Executive Directors stating, at  
22 BKD2092668: [REDACTED]  
23 [REDACTED]  
24 [REDACTED]” This document was produced by Defendants in  
25 response to Plaintiffs' requests for production of documents in this action with Bates numbers  
26 BKD2092668 through BKD2092670, and was marked as Deposition Exhibit 269.

27 56. Attached hereto as Exhibit 43 is a true and correct copy of a Brookdale presentation  
28 entitled “Welcome to Service Alignment Clinical Reports,” identified as

1 [REDACTED], which was produced by Defendants in response to Plaintiffs'  
2 requests for production of documents in this action with Bates numbers BKD2522732 through  
3 BKD2522746, and was marked as Deposition Exhibit 165.

4 57. Attached hereto as Exhibit 44 is a true and correct copy of a Brookdale slide presentation  
5 entitled "Service Alignment Dashboards, Reports and Results," that identifies [REDACTED]

6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED] This document was produced by  
9 Defendants in response to Plaintiffs' requests for production of documents in this action with Bates  
10 numbers BKD2844883 through BKD2844888.

11 58. Attached hereto as Exhibit 45 is a true and correct copy of a Brookdale Slide  
12 Presentation entitled "Clinical Reports Overview," which was produced by Defendants in response to  
13 Plaintiffs' requests for production of documents in this action with Bates numbers BKD2511086  
14 through BKD2511101, and was marked as Deposition Exhibit 167.

15 59. Attached hereto as Exhibit 46 is a true and correct copy of a Brookdale email thread that  
16 includes an email dated March 3, 2017 from Sheila Garner, as Senior Regional Vice President of  
17 Operations for the West Division in which she states, at BKD1840916: [REDACTED]

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED] This  
21 document was produced by Defendants in response to Plaintiffs' requests for production of documents  
22 with Bates numbers BKD1840915 through 1840917 and was marked as Deposition Exhibit 270.

23 60. Attached hereto as Exhibit 47 is a true and correct copy of Brookdale's May 17, 2017  
24 "Corrective Action" for Sharyl Ronan, who was the Regional Vice President of Operations for Region  
25 02 of Brookdale's West Division. It describes [REDACTED]

26 [REDACTED]  
27 [REDACTED] This document was  
28

1 produced by Defendants in response to Plaintiffs' requests for production of documents in this action  
2 with Bates numbers BKD2608663 through BKD2608665 and was marked as Deposition Exhibit 272.

3 61. Attached hereto as Exhibit 48 is a true and correct copy of Brookdale's May 26, 2017  
4 "Corrective Action" for Craig Clark, who held the position of Executive Director III for Brookdale's  
5 San Juan Capistrano facility. At BKD1898369, it identifies [REDACTED]

6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED] This document was produced by Defendants in response to Plaintiffs' requests for production  
9 of documents in this action with Bates numbers BKD1898368 through BKD1898369, and was marked  
10 as Deposition Exhibit 273.

11 62. Attached hereto as Exhibit 49 is a true and correct copy of a document produced by  
12 Defendants in response to Plaintiffs' requests for production of documents in this action having Bates  
13 numbers BKD2025104 through BKD2025109. It combines a document entitled "Supervisor's Guide to  
14 Completing an Action Plan" and an Action Plan dated April 13, 2016, for Kelly Grounds, a Brookdale  
15 District of Operations at the time. At BKD2025106, the Action Plan identifies [REDACTED] as

16 [REDACTED] and identifies a [REDACTED]  
17 [REDACTED] This document was  
18 marked as Deposition Exhibit 275 in this action.

19 **DEPOSITION TESTIMONY SUBMITTED IN SUPPORT OF CLASS CERTIFICATION**

20 63. Attached hereto as Exhibit 50 is a true and correct copy of the complete transcript of the  
21 June 23, 2021 deposition of Kevin Bowman, the President of Brookdale's West Division. Mr. Bowman  
22 testified in his capacity as Defendants' Rule 30(b)(6) designee on topic 2 of Plaintiffs' Notice of  
23 Deposition Pursuant to Rule 30(b)(6), which included Brookdale's policies, procedures and practices, if  
24 any, for ensuring that its California facilities are in compliance with the requirements of Title III of the  
25 Americans with disabilities Act of 1990 and its implementing regulations and California's Unruh Civil  
26 Rights Act, Cal. Civ. Code §§ 51 et seq. This topic included, but was not limited to, actions taken to  
27 achieve compliance with those disability access provisions, the dates on which its facilities were  
28 constructed or altered, complaints and responses to complaints about the inaccessibility of its facilities,

1 efforts to identify and/or remove access barriers, and efforts to make reasonable accommodations for  
2 residents with disabilities, including by increasing caregiving staffing.

3 64. Attached hereto as Exhibit 51 is a true and correct copy of the transcript of the July 13,  
4 2021 deposition of Kevin Bowman, testifying in his capacity as a Rule 30(b)(6) designee for  
5 Defendants on topic 5 of Plaintiffs Rule 30(b)(6) deposition notice, which sought testimony on  
6 Brookdale's policies, procedures and/or practices for assessing the needs for and delivering personal  
7 services to residents. The topic included, but was not limited to, Brookdale's policies, procedures and  
8 practices for evaluating the needs of residents; developing personal service plans; setting, monitoring  
9 and adjusting staffing levels; establishing, monitoring and enforcing labor benchmarks; and the  
10 calculation and use of estimated task times for providing personal services.

11 65. Attached hereto as Exhibit 52 is a true and correct copy of the transcript of the July 14,  
12 2021 deposition of Kevin Bowman, testifying in a second session in his capacity as a Rule 30(b)(6)  
13 designee for Defendants on topic 5 of Plaintiffs' Rule 30(b)(6) deposition notice.

14 66. Attached hereto as Exhibit 53 are true and correct copies of excerpts of the transcript of  
15 the deposition taken in this case on April 21, 2021 of Rhonda Dolcater, the former Division Director of  
16 Service Alignment for Brookdale's West Division.

17 67. Attached hereto as Exhibit 54 is a true and correct copy of excerpts of the transcript of  
18 the deposition taken on March 17, 2021 of Theresa Ward, the Executive Director of Brookdale Sunwest  
19 and former Executive Director of Brookdale's Rancho Mirage, Palm Springs, Cherry Hills and Grand  
20 Terrace facilities.

21 68. Attached hereto as Exhibit 55 is a true and correct copy of excerpts of the transcript of  
22 the deposition taken on March 24, 2021 of Marie Harris, Executive Director of Brookdale's San Jose  
23 facility and former Executive Director of its Scott's Valley facility.

24 69. Attached hereto as Exhibit 56 is a true and correct copy of excerpts of the transcript of  
25 the deposition taken on March 18, 2021, of Kimia Ataeian, Executive Director of Brookdale's  
26 Brookhurst facility.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Guy B. Wallace

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court, Northern District of California, by using the Court's CM/ECF system on August 18, 2021.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the Court's CM/ECF system.

Dated: August 18, 2021

/s/ Guy B. Wallace  
Guy B. Wallace

# **Exhibit 1**

**Filed Conditionally Under Seal**



# **Exhibit 2**

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BROOKDALE SENIOR LIVING, INC. and

BROOKDALE SENIOR LIVING COMMUNITIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

STACIA STINER, et al.,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;

BROOKDALE SENIOR LIVING

COMMUNITIES, INC.; and DOES 1 through 100,

Defendants.

Case No. 4:17-CV-03962-HSG

**DEFENDANTS' SUPPLEMENTAL  
RESPONSES TO PLAINTIFF HELEN  
CARLSON'S INTERROGATORIES, SET  
ONE**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Brookdale Senior Living, Inc. and Brookdale Senior Living Communities, Inc. (“Brookdale”), by and through their attorneys, hereby submit their Supplemental Responses and Objections (“Responses”) to Plaintiff Helen Carlson’s Interrogatories Propounded on Brookdale, Set One (“Interrogatories”).

### **PRELIMINARY STATEMENT**

Brookdale makes these Responses to the Interrogatories expressly reserving and without waiver of: (a) all rights to object on the basis of competency, relevance, materiality, confidentiality, authenticity, privilege, or any other proper grounds to the use of any of Brookdale’s responses or objections to the Interrogatories, any information contained therein, or any documents produced in response to the Interrogatories, as evidence, in whole or in part, in any subsequent proceeding, action, or matter, or in any trial in this or any other action; (b) all rights to object on any ground and at any time to a demand or request for further response to the Interrogatories, other discovery requests, or proceedings involving or related to the subject matter of the Interrogatories, information, or documents Brookdale has provided or may provide in response to the Interrogatories; and (c) the right at any time to review, revise, correct, add to, supplement, amend, or clarify any of the responses propounded herein.

Brookdale has not yet completed its discovery and investigation of the facts pertaining to the above-captioned action (the “Action”), review of its own documents, or trial preparation. Brookdale bases its responses and objections on information now known to Brookdale. Brookdale reserves the right to rely on any facts or other evidence that may develop or come to its attention at a later date.

These Responses are subject to amendment and supplementation as Brookdale acquires additional information and completes its review and analysis. Brookdale’s Responses to the Interrogatories were prepared in consultation with its attorneys and may not exactly match the words or phrases that might be used by individual employees in the course of this litigation to describe events, policies, or matters discussed herein.

### **OBJECTIONS TO ALL INTERROGATORIES**

1. Brookdale objects to the Interrogatories as overly broad, unduly burdensome, and not proportionate to the needs of this case to the extent that they seek documents and information regarding

1 each and every resident and/or from each and every community that Brookdale has operated in  
2 California. Brookdale has operated approximately 90 communities in California over the course of just  
3 the past six years, and producing all information related to these Interrogatories for all communities,  
4 many of which are no longer affiliated with Brookdale, would impose an unreasonable burden.

5 2. Brookdale objects to the Interrogatories to the extent they seek work product, trial  
6 preparation materials, identification of documents prepared after the commencement of this litigation,  
7 communications protected from disclosure by the attorney-client privilege, or documents protected from  
8 disclosure by any applicable law, rule, privilege or immunity. Nothing contained in these Responses is  
9 intended to or may be construed as a waiver of the attorney-client privilege, the work product doctrine,  
10 or any other applicable law, rule, or privilege.

11 3. Brookdale objects to the Interrogatories, and to the definitions and instructions  
12 accompanying the Interrogatories, to the extent they seek or purport to impose definitions, instructions,  
13 or obligations outside of those imposed by Rules 26 and 33 of the Federal Rules of Civil Procedure, the  
14 Local Civil Rules of this Court, or the Orders of this Court. Brookdale will respond to the  
15 Interrogatories in accordance with its obligations as set forth in those Rules and/or Orders.

16 4. Brookdale objects to the Interrogatories to the extent that they seek trade secrets and/or  
17 confidential and/or proprietary business information.

18 5. Brookdale objects to the Interrogatories to the extent that they seek information that is  
19 publicly available or otherwise accessible to Plaintiffs.

20 6. Brookdale objects to the Interrogatories to the extent that they fail to identify the  
21 information to be produced with reasonable particularity. Brookdale responds to each of the individual  
22 Interrogatories as it understands and interprets each Interrogatory. Brookdale reserves the right to  
23 amend or supplement these Responses in the event that Plaintiffs later assert a different interpretation  
24 that is accepted by Brookdale.

25 7. Brookdale objects to these Interrogatories to the extent they exceed the number of  
26 interrogatories permitted by the Federal Rules of Civil Procedure, including the instructions and  
27 subparts, without leave of Court.

1           8.       Brookdale objects to the definition of the terms “ANY” and “ALL” as overbroad, unduly  
2 burdensome, vague, indefinite, ambiguous, and not proportionate to the legitimate discovery needs of  
3 the case. Plaintiffs’ definition of these terms requires a simultaneously expansive and restrictive reading  
4 of both. Brookdale construes “any” and “all” as they are commonly understood in ordinary English.

5           9.       Brookdale objects to Plaintiffs’ definition of “BROOKDALE” as overbroad, unduly  
6 burdensome, oppressive, or harassing to the extent it encompasses any entity other than Brookdale.  
7 Brookdale does not have possession, custody, or control over materials that other entities or persons may  
8 have. Brookdale similarly objects to Plaintiffs’ instruction that Brookdale is required to produce  
9 documents in the possession, custody, or control of other entities or persons, including Brookdale’s  
10 employees in their personal capacity. That instruction is beyond the scope of the duty provided by the  
11 Federal Rules of Civil Procedure. In these Responses, Brookdale construes “BROOKDALE” to refer  
12 only to Brookdale, and Brookdale’s officers and employees serving in their capacity as agents of  
13 Brookdale, and Brookdale will only produce documents or provide information that is within its  
14 possession, custody, or control.

15           10.     Brookdale objects to Plaintiffs’ definition of “DOCUMENT” as overly broad, unduly  
16 burdensome, oppressive, or harassing to the extent that it improperly expands the scope of the term  
17 defined in Fed. R. Civ. P. 34(a)(1)(A) and seeks documents not in Brookdale’s possession, custody, or  
18 control. Brookdale further objects to Plaintiffs’ definition of “DOCUMENT” as overly broad and  
19 unduly burdensome to the extent that it seeks to impose burdens or obligations beyond those imposed by  
20 the Federal Rules of Civil Procedure or certain case management orders and other orders applicable to  
21 this Action. In these Responses, Brookdale construes the term “Documents” to refer only to documents  
22 that fall under the definition in Fed. R. Civ. P. 34(a)(1)(A), and that are currently in Brookdale’s  
23 possession, custody, or control. Brookdale objects to Plaintiffs’ definition to the extent that by “ANY  
24 work papers, desk files, electronically-stored documents, electronic communications (such as e-mail),  
25 stored in computers or otherwise, whether or not ever printed or displayed,” Plaintiffs would require that  
26 Brookdale search all communications platforms and databases for documents in response to each  
27 Interrogatory. To the extent Brookdale agrees to produce documents or information, it will conduct a  
28

1 reasonable search for documents or information in those locations that are reasonably likely to have  
2 relevant, non-duplicative, and non-cumulative information.

3 11. Brookdale objects to Plaintiffs' definition of "RESIDENCY AGREEMENT" as  
4 overbroad, unduly burdensome, oppressive, or harassing to the extent it encompasses any entity other  
5 than Brookdale. Brookdale does not have possession, custody, or control over materials that other  
6 entities or persons may have. Brookdale similarly objects to Plaintiffs' instruction that Brookdale is  
7 required to produce documents in the possession, custody, or control of other entities or persons,  
8 including Brookdale's employees in their personal capacity. That instruction is beyond the scope of the  
9 duty provided by the Federal Rules of Civil Procedure. In these Responses, Brookdale construes  
10 "RESIDENCY AGREEMENT" to refer only to agreements for residency between Brookdale and  
11 Resident, as Brookdale interprets that term, or their representative, and Brookdale will only produce  
12 documents and information that are within its possession, custody, or control.

13 12. Brookdale objects to Plaintiffs' definition of "YOU, YOUR, YOURSELF," and  
14 "DEFENDANT" as overly broad, unduly burdensome, oppressive, or harassing to the extent it  
15 encompasses any entity other than Brookdale. Brookdale does not have possession, custody, or control  
16 over other entities or persons or any materials they may have. Brookdale similarly objects to Plaintiffs'  
17 instruction that Brookdale is required to produce documents in the possession, custody, or control of  
18 other entities or persons, including Brookdale's employees in their personal capacity. All of these  
19 definitions attempt to create a duty and burden on Brookdale beyond the scope of those provided in the  
20 Federal Rules of Civil Procedure, the local rules of the Northern District of California, or standing  
21 orders, case management orders, or other orders entered by the Court, and are therefore improper. In  
22 these Responses, Brookdale construes "YOU, YOUR, YOURSELF," and "DEFENDANT" to refer only  
23 to Brookdale itself and Brookdale's officers and employees serving in their capacity as agents of  
24 Brookdale, and will only produce documents or information that are within its possession, custody, or  
25 control.

26 13. Each and every answer is made subject to the foregoing general objections and to any  
27 protective order entered by the Court, regardless of whether a general or specific objection is stated in  
28

the answer to the particular Interrogatory, and Brookdale does not waive any general objections not referred to in any particular answer.

14. Brookdale reserves the right to supplement its Responses with information or documents that come to its attention or become available after service of these Responses and to use such information at any hearing or proceeding, including the trial of this or any other action.

## **RESPONSES TO PLAINTIFFS' INTERROGATORIES**

### **INTERROGATORY NO. 1:**

For each FACILITY, please identify by name, Employee Identification Number, position, and tenure (beginning and ending date) the individuals who served in the positions of Executive Director (I, II, III or Bench), Director, Health and Wellness, or Business Office Manager at that FACILITY during the CLASS PERIOD. For the purpose of this Interrogatory, Employee Identification Number means the identification number of the employee used in YOUR Kronos payroll system.

### **RESPONSE TO NO. 1:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory as unduly burdensome and not proportional to the needs of this case to the extent that it would require Brookdale to sort through an indefinite number of records to identify each individual who served in each of the positions designated in this Interrogatory, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows:



Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Alhambra	Health & Wellness Director	000441141	Jing Fang	Zhang	6/29/2012	
Brookdale Alhambra	Business Office Manager	000468862	Graciela Flor	Vega	10/13/2014	1/6/2016
Brookdale Alhambra	Executive Director I	000427354	Nestor	Eligio	4/8/2013	8/18/2017
Brookdale Alhambra	Executive Director I	000476734	Michelle	Boykin	12/29/2014	6/28/2016
Brookdale Alhambra	Executive Director I	000561483	Mary	Cruz	8/1/2016	6/4/2017
Brookdale Alhambra	Executive Director II	000584288	Tracey	Holder	1/16/2017	
Brookdale Alhambra	Executive Director I	000608774	Lisa	To	7/31/2017	
Brookdale Alhambra	Executive Director II	000608774	Lisa	To	7/31/2017	
Brookdale Anaheim	Health & Wellness Director	000439358	Jennifer	Campas	7/30/2013	5/6/2019
Brookdale Anaheim	Health & Wellness Director	000439358	Jennifer	Campas	7/30/2013	5/6/2019
Brookdale Anaheim	Health & Wellness Director	000639081	Mink	Medina	3/8/2018	
Brookdale Anaheim	Executive Director I	000427359	Esmeralda	De La Torre	6/6/2005	10/15/2019
Brookdale Anaheim	Executive Director I	000435077	Carrie	Galloway	2/15/2010	
Brookdale Anaheim	Executive Director II	000435077	Carrie	Galloway	2/15/2010	
Brookdale Anaheim	Executive Director II	000498055	Troy	Byington	6/15/2015	
Brookdale Antelope Valley	Business Office Manager	000432569	Andrea	Gutierrez	8/24/2007	1/31/2019
Brookdale Antelope Valley	Health & Wellness Director	000453388	Sharon	Molster	8/27/2008	3/3/2018
Brookdale Antelope Valley	Health & Wellness Director	000637457	Angelina	Lafler	2/22/2018	1/31/2019
Brookdale Antelope Valley	Health & Wellness Director	000637700	Nancy	Serrano	3/12/2018	8/6/2018
Brookdale Antelope Valley	Executive Director I	000109504	Freda	Brock	9/23/1996	1/31/2019
Brookdale Antelope Valley	Business Office Manager	000432569	Andrea	Gutierrez	8/24/2007	1/31/2019
Brookdale Antelope Valley	Health & Wellness Director	000637457	Angelina	Lafler	2/22/2018	1/31/2019
Brookdale Antelope Valley	Executive Director I	000109504	Freda	Brock	9/23/1996	1/31/2019
Brookdale Apple Valley	Business Office Manager	000433605	Chelsea	Plank	2/17/2014	1/31/2019
Brookdale Apple Valley	Health & Wellness Director	000434186	Margaret	Chestnut	11/26/2013	11/3/2016
Brookdale Apple Valley	Health & Wellness Director	000470877	Israel	Regus	10/30/2014	1/31/2019
Brookdale Apple Valley	Health & Wellness Director	000580999	Melanie	Leath	12/16/2016	4/6/2017
Brookdale Apple Valley	Business Office Manager	000638137	Valarie	Robeson	2/28/2018	9/11/2018
Brookdale Apple Valley	Executive Director I	000426977	Diane	Machain	2/26/2013	7/20/2016
Brookdale Apple Valley	Executive Director I	000430679	Traci	Hollingsworth	9/15/2011	5/23/2017
Brookdale Apple Valley	Executive Director I	000607747	Dana	Ramirez	7/17/2017	1/28/2019
Brookdale Apple Valley	Business Office Manager	000433605	Chelsea	Plank	2/17/2014	1/31/2019

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Apple Valley	Health & Wellness Director	000470877	Israel	Regus	10/30/2014	1/31/2019
Brookdale Apple Valley	Executive Director I	000607747	Dana	Ramirez	7/17/2017	1/28/2019
Brookdale Auburn	Health & Wellness Director	000354735	Alejandra	Sallee	11/7/2011	
Brookdale Auburn	Health & Wellness Director	000427154	Leisha	Flores	8/22/2011	3/13/2016
Brookdale Auburn	Health & Wellness Director	000529529	Jennifer	Combs	12/27/2015	11/1/2016
Brookdale Auburn	Health & Wellness Director	000580763	Janelle	Jones	12/22/2016	4/29/2017
Brookdale Auburn	Health & Wellness Director	000592626	Lynda	Murray	3/22/2017	4/5/2018
Brookdale Auburn	Health & Wellness Director	000646387	Heidi	Lencioni	5/14/2018	12/11/2019
Brookdale Auburn	Health & Wellness Director	000719167	Kylie	Whitaker	2/21/2020	
Brookdale Auburn	Executive Director II	000354735	Alejandra	Sallee	11/7/2011	
Brookdale Auburn	Executive Director I	000427154	Leisha	Flores	8/22/2011	3/13/2016
Brookdale Auburn	Executive Director I	000427337	Joyce	Perkins	1/6/2014	1/12/2018
Brookdale Auburn	Executive Director I	000473553	Jim	Sidoti	11/12/2014	9/17/2015
Brookdale Auburn	Executive Director I	000515041	Lisa	Huntzinger	9/17/2015	1/11/2020
Brookdale Auburn	Executive Director II	000515041	Lisa	Huntzinger	9/17/2015	1/11/2020
Brookdale Bakersfield	Business Office Manager	000439037	Sasha	McKeen	2/13/2004	4/30/2019
Brookdale Bakersfield	Health & Wellness Director	000453124	Sarah	Archuleta-Weaver	9/13/2011	
Brookdale Bakersfield	Executive Director I	000426631	Scott	Eckstein	8/30/2013	2/23/2016
Brookdale Bakersfield	Executive Director I	000490897	Pamela	Bradley	5/4/2015	
Brookdale Bakersfield	Executive Director I	000674566	Robin	Smith	12/31/2018	3/7/2019
Brookdale Brea	Health & Wellness Director	000452618	Monica	Rangel	3/24/2014	6/24/2016
Brookdale Brea	Business Office Manager	000476795	Barbara	Tyler	12/18/2014	
Brookdale Brea	Health & Wellness Director	000559341	Denise	Bartley	7/20/2016	
Brookdale Brea	Executive Director I	000426935	Charles	Eusey	10/21/2013	1/24/2020
Brookdale Brea	Executive Director II	000426935	Charles	Eusey	10/21/2013	1/24/2020
Brookdale Brea	Executive Director II	000623109	Sarah	DeVore	11/15/2017	
Brookdale Brookhurst	Business Office Manager	000430863	Danielle	Chairez	10/25/2004	
Brookdale Brookhurst	Health & Wellness Director	000502675	Dalee	La Bier-Putnam	6/29/2015	12/30/2016
Brookdale Brookhurst	Health & Wellness Director	000590002	Mark	Soria	3/20/2017	9/19/2019
Brookdale Brookhurst	Health & Wellness Director	000705877	Ruby	Ramirez	10/21/2019	8/31/2020
Brookdale Brookhurst	Health & Wellness Director	000735918	Ninad	Dadabhoy	10/12/2020	
Brookdale Brookhurst	Executive Director I	000427071	Melanie	Washington	7/23/2012	1/25/2017

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Brookhurst	Executive Director I	000427359	Esmeralda	De La Torre	6/6/2005	10/15/2019
Brookdale Brookhurst	Executive Director II	000427359	Esmeralda	De La Torre	6/6/2005	10/15/2019
Brookdale Brookhurst	Executive Director II	000700844	Kimia	Ataeian	9/3/2019	
Brookdale Camarillo	Health & Wellness Director	000438395	Jowell	Ovenson	10/31/2011	1/31/2021
Brookdale Camarillo	Executive Director III	000426798	Vincent	Gonzaga	5/16/2011	1/31/2021
Brookdale Carlsbad	Business Office Manager	000441324	Patricia	Totorica	7/14/2014	1/31/2021
Brookdale Carlsbad	Health & Wellness Director	000463324	Sonia	Molina	9/9/2014	5/21/2018
Brookdale Carlsbad	Health & Wellness Director	000571998	William	Lewallen	10/17/2016	11/22/2019
Brookdale Carlsbad	Health & Wellness Director	000657493	Caroline	Kilby	7/31/2018	8/27/2018
Brookdale Carlsbad	Health & Wellness Director	000714133	Kahina	Hadibi	1/6/2020	1/31/2021
Brookdale Carlsbad	Executive Director III	000427358	Sasha	Hightower	12/10/2007	1/31/2021
Brookdale Carmel Valley	Health & Wellness Director	000433140	Lizzie Ann	Dela Fuente	6/21/2005	3/28/2021
Brookdale Carmel Valley	Business Office Manager	000434654	Kathleen	Neilson Soto	9/23/2013	3/28/2021
Brookdale Carmel Valley	Health & Wellness Director	000441905	Sara	Tizazu	5/24/2006	5/26/2017
Brookdale Carmel Valley	Executive Director III	000427216	Fred	Jackson	6/18/2012	5/21/2015
Brookdale Carmel Valley	Executive Director III	000507191	Jason	McDonald	8/3/2015	12/21/2017
Brookdale Carmel Valley	Executive Director III	000551811	Erika	Castile	6/14/2016	3/28/2021
Brookdale Casa Whittier	Health & Wellness Director	000431706	Michael	Alonzo	3/14/2014	8/17/2018
Brookdale Casa Whittier	Business Office Manager	000453261	Gail	Blessum	2/27/2006	8/3/2015
Brookdale Casa Whittier	Executive Director I	000426631	Scott	Eckstein	8/30/2013	2/23/2016
Brookdale Casa Whittier	Executive Director I	000426631	Scott	Eckstein	8/30/2013	2/23/2016
Brookdale Casa Whittier	Executive Director I	000427086	Tonya	Reynolds	9/14/2009	5/21/2015
Brookdale Central Whittier	Health & Wellness Director	000433059	Amy	Rogers	6/30/2008	
Brookdale Central Whittier	Health & Wellness Director	000436838	Nancy	Vera	11/16/2009	7/1/2015
Brookdale Central Whittier	Business Office Manager	000437869	Sabrina	Stearns	6/2/2006	6/1/2017
Brookdale Central Whittier	Health & Wellness Director	000505207	Gracie	Vaughn	7/15/2015	
Brookdale Central Whittier	Executive Director I	000269139	Marielouise	Harris	8/27/2007	
Brookdale Central Whittier	Executive Director I	000539457	Vicky	Torres	3/14/2016	2/28/2017
Brookdale Central Whittier	Executive Director I	000593983	Tami	Ojwang	4/17/2017	7/19/2018

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Central Whittier	Executive Director I	000665491	Robert	Jakini	9/26/2018	12/3/2020
Brookdale Central Whittier	Executive Director II	000665491	Robert	Jakini	9/26/2018	12/3/2020
Brookdale Central Whittier	Executive Director II	000732038	Steven	Sciurba	8/10/2020	2/19/2021
Brookdale Chanate	Business Office Manager	000321226	Tamara	Johnson	3/5/2010	1/6/2020
Brookdale Chanate	Business Office Manager	000330358	Jahaira	Centeno	8/15/2010	12/11/2018
Brookdale Chanate	Health & Wellness Director	000380201	Brenda	Brown	11/1/2012	4/7/2016
Brookdale Chanate	Business Office Manager	000391511	Kara	Moore	4/19/2013	10/20/2016
Brookdale Chanate	Health & Wellness Director	000409807	Brent	Hughes	12/17/2013	5/15/2017
Brookdale Chanate	Business Office Manager	000414255	Danielle	Oseguera	2/27/2014	
Brookdale Chanate	Health & Wellness Director	000535850	Dolores	Evans	2/15/2016	6/7/2016
Brookdale Chanate	Health & Wellness Director	000557863	Lesa	Taylor	7/25/2016	12/28/2016
Brookdale Chanate	Health & Wellness Director	000582105	Kenneth	Harbison	1/19/2017	4/15/2017
Brookdale Chanate	Health & Wellness Director	000612983	Jodi	Raper	8/15/2017	11/25/2018
Brookdale Chanate	Health & Wellness Director	000613013	Stephanie	Sepeda	8/14/2017	
Brookdale Chanate	Executive Director I	000405650	Susan	Edwards	11/4/2013	4/7/2017
Brookdale Chanate	Executive Director I	000426998	M. Monique	Dixon	9/9/2013	12/24/2019
Brookdale Chanate	Executive Director II	000428520	Maria	Nepomuceno Cortes	1/13/2009	
Brookdale Chanate	Executive Director II	000512905	Robert	Alvarado	9/2/2015	
Brookdale Chanate	Executive Director I	000665850	Mitzi	Thackston	10/1/2018	1/22/2019
Brookdale Chanate	Executive Director I	000674946	Steven	Mattingly	12/17/2018	1/27/2021
Brookdale Chanate	Executive Director II	000674946	Steven	Mattingly	12/17/2018	1/27/2021
Brookdale Chatsworth	Business Office Manager	000271271	Nananne	Eichermueller	10/8/2007	
Brookdale Chatsworth	Health & Wellness Director	000296567	Vivian	Reyes	10/28/2008	2/21/2017
Brookdale Chatsworth	Business Office Manager	000434059	Claudia	Villa	2/5/2008	
Brookdale Chatsworth	Health & Wellness Director	000435932	Denise	Lugo	1/9/2014	11/1/2015
Brookdale Chatsworth	Health & Wellness Director	000577005	Vida	Gonzales	12/21/2016	5/29/2019
Brookdale Chatsworth	Health & Wellness Director	000610930	Amanda	Donis	8/1/2017	
Brookdale Chatsworth	Health & Wellness Director	000683218	Jonathan	Sosa	3/25/2019	11/1/2020
Brookdale Chatsworth	Business Office Manager	000688798	Rose	Manriquez	5/6/2019	7/5/2019
Brookdale Chatsworth	Business Office Manager	000697538	Elizabeth	Flores	7/21/2019	3/9/2020
Brookdale Chatsworth	Executive Director II	000457012	Melanie	Rivera	8/1/2014	2/19/2016



Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Chatsworth	Executive Director II	000570454	Treves	Baker	10/10/2016	12/19/2019
Brookdale Chatsworth	Executive Director II	000687551	Dina	Davis	4/29/2019	
Brookdale Chatsworth	Executive Director II	000693186	Lilit	Chaparyan	6/17/2019	12/31/2020
Brookdale Cherry Hills	Health & Wellness Director	000064379	Barbara	Bradshaw	4/28/2003	9/21/2015
Brookdale Cherry Hills	Business Office Manager	000297465	Norma	De Anda	11/17/2008	12/6/2015
Brookdale Cherry Hills	Business Office Manager	000397071	Tricia	Jacobs	7/1/2013	1/3/2018
Brookdale Cherry Hills	Business Office Manager	000420376	Lorena	Vidrio	5/19/2014	6/28/2016
Brookdale Cherry Hills	Health & Wellness Director	000436868	Karen	Roper	3/13/2014	8/31/2017
Brookdale Cherry Hills	Health & Wellness Director	000546773	Rachelle	Wheaton	4/27/2016	3/21/2018
Brookdale Cherry Hills	Business Office Manager	000634023	Tina	Meyer	1/29/2018	3/21/2018
Brookdale Cherry Hills	Executive Director II	000261751	Jennifer	Benner	2/9/2004	3/15/2017
Brookdale Cherry Hills	Executive Director I	000422032	Krystal	Jenkins	6/6/2014	3/16/2018
Brookdale Cherry Hills	Executive Director II	000427037	Theresa	Ward	5/8/2006	
Brookdale Citrus Heights	Health & Wellness Director	000486584	Ali	Hernandez	3/12/2015	9/15/2015
Brookdale Citrus Heights	Health & Wellness Director	000521985	Glenda	Anderson	11/2/2015	3/17/2016
Brookdale Citrus Heights	Health & Wellness Director	000528904	Colleen	Karlin	12/18/2015	12/22/2016
Brookdale Citrus Heights	Health & Wellness Director	000553265	Rachel	Frink	7/5/2016	10/29/2019
Brookdale Citrus Heights	Health & Wellness Director	000670210	Naveet	Kaur	11/1/2018	12/14/2020
Brookdale Citrus Heights	Health & Wellness Director	000730587	Sumit	Benipal	8/3/2020	
Brookdale Citrus Heights	Executive Director I	000069687	Zachary	Butcher	2/14/2011	
Brookdale Citrus Heights	Executive Director I	000360819	Verla	Wright	2/20/2012	12/16/2015
Brookdale Citrus Heights	Executive Director I	000427108	Mayra	Voet	7/28/2005	3/20/2018
Brookdale Citrus Heights	Executive Director I	000427337	Joyce	Perkins	1/6/2014	1/12/2018
Brookdale Citrus Heights	Executive Director I	000456035	Gregory	Awrey	8/6/2014	7/18/2019
Brookdale Citrus Heights	Executive Director I	000645558	Cassiana	Bush	4/30/2018	10/23/2018
Brookdale Citrus Heights	Executive Director I	000682928	Jennifer	Scarberry	3/18/2019	3/16/2021
Brookdale Clairemont	Health & Wellness Director	000327552	Jessica	Zebroski	6/22/2010	3/30/2020
Brookdale Clairemont	Health & Wellness Director	000436030	Audra	Bristol	3/1/2007	9/3/2015

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Clairemont	Health & Wellness Director	000436868	Karen	Roper	3/13/2014	8/31/2017
Brookdale Clairemont	Business Office Manager	000495934	Stephanie	Creer	5/12/2015	4/12/2019
Brookdale Clairemont	Health & Wellness Director	000517127	Kelly	Biondo	10/5/2015	1/31/2017
Brookdale Clairemont	Health & Wellness Director	000527043	Karen	Zorichak	12/7/2015	4/20/2018
Brookdale Clairemont	Health & Wellness Director	000591919	Melissa	Lo Verde	3/22/2017	8/22/2017
Brookdale Clairemont	Health & Wellness Director	000613412	Jacasea	Davis	9/11/2017	12/8/2017
Brookdale Clairemont	Health & Wellness Director	000655874	Amy	Blackhurst	7/23/2018	3/9/2019
Brookdale Clairemont	Business Office Manager	000692433	Aaron	Philips	6/7/2019	
Brookdale Clairemont	Health & Wellness Director	000723167	Ashley	Baino-Jaimes	4/27/2020	
Brookdale Clairemont	Executive Director I	000426405	Laurie	Tomasello	4/10/2007	7/20/2016
Brookdale Clairemont	Executive Director II	000525466	Judith	Pierfax	11/30/2015	
Brookdale Clairemont	Executive Director I	000528468	Lori	Hansen	12/28/2015	1/30/2017
Brookdale Clairemont	Executive Director I	000529234	Sarah	Wheeler	12/23/2015	3/29/2018
Brookdale Clairemont	Executive Director I	000609291	Donelle	Williams	7/28/2017	1/4/2021
Brookdale Clairemont	Executive Director II	000609291	Donelle	Williams	7/28/2017	1/4/2021
Brookdale Clearlake	Health & Wellness Director	000432832	Christopher	Long	5/12/2014	6/25/2015
Brookdale Clearlake	Health & Wellness Director	000508521	Bridget	Wulff	8/17/2015	3/16/2016
Brookdale Clearlake	Health & Wellness Director	000547238	Tamara	Lyons	5/9/2016	10/14/2016
Brookdale Clearlake	Health & Wellness Director	000601903	Celestine	Mumah	6/20/2017	8/17/2018
Brookdale Clearlake	Executive Director I	000336867	Melon	Rivera	12/3/2010	11/28/2018
Brookdale Clearlake	Executive Director I	000427177	Tanya	Jones	8/14/2012	11/18/2015
Brookdale Clearlake	Executive Director I	000452723	Martha	Nkhoma	7/2/2012	3/11/2021
Brookdale Clearlake	Executive Director I	000587690	Jeffrey	Vonwal	2/15/2017	1/31/2019
Brookdale Clearlake	Health & Wellness Director	000601903	Celestine	Mumah	6/20/2017	8/17/2018
Brookdale Clearlake	Executive Director I	000587690	Jeffrey	Vonwal	2/15/2017	1/31/2019
Brookdale Corona	Health & Wellness Director	000069877	Antarpreet	Kang	9/17/2007	
Brookdale Corona	Health & Wellness Director	000069877	Antarpreet	Kang	10/19/2014	
Brookdale Corona	Health & Wellness Director	000453661	Julie	Olmedo	8/28/2009	5/16/2016
Brookdale Corona	Health & Wellness Director	000550994	Dawn	Monahan	5/29/2016	3/9/2018
Brookdale Corona	Health & Wellness Director	000595045	Roanne	Ramos	4/21/2017	5/25/2018
Brookdale Corona	Executive Director I	000168517	Maritza	Lujan	12/28/1999	

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Corona	Executive Director I	000427098	Joyce	Ladner	11/17/2010	5/16/2016
Brookdale Corona	Executive Director I	000438116	Carol Ann	LeRose	2/11/2013	5/6/2020
Brookdale Corona	Executive Director I	000554284	Shannon	Johnson	6/26/2016	2/3/2017
Brookdale Corona	Executive Director I	000592287	Susan	Morris	3/27/2017	4/20/2018
Brookdale Danville	Health & Wellness Director	000431186	Stephen	Kiehn	5/30/2013	2/23/2016
Brookdale Danville	Health & Wellness Director	000454418	Kadijatu	Barrie	8/1/2014	
Brookdale Danville	Health & Wellness Director	000561957	Roschelle	Factor	8/8/2016	
Brookdale Danville	Health & Wellness Director	000585735	Victoriya	Centilli	2/13/2017	5/12/2017
Brookdale Danville	Health & Wellness Director	000600311	Navdeep	Kaur	6/5/2017	7/20/2018
Brookdale Danville	Health & Wellness Director	000660990	Katherine	Mariano	9/11/2018	9/21/2018
Brookdale Danville	Health & Wellness Director	000670319	Alysa	Servida	11/12/2018	
Brookdale Danville	Health & Wellness Director	000704169	Samantha	Hudson	9/30/2019	1/17/2020
Brookdale Danville	Health & Wellness Director	000720715	Wilma	Golding	3/22/2020	3/23/2020
Brookdale Danville	Health & Wellness Director	000728413	Raymund	Alvarez	7/6/2020	11/12/2020
Brookdale Danville	Health & Wellness Director	000737768	Brigette	Najjar	10/26/2020	3/4/2021
Brookdale Danville	Executive Director I	000427346	Vanessa	Souza	6/12/2014	7/12/2016
Brookdale Danville	Executive Director I	000491187	Katie	Heatherly	4/13/2015	8/3/2017
Brookdale Danville	Executive Director I	000510200	Steve	Millard	8/17/2015	9/7/2017
Brookdale Danville	Executive Director I	000617474	Sonya	Johnson	9/25/2017	10/12/2018
Brookdale Danville	Executive Director I	000675945	Claudia	Morales	1/2/2019	10/8/2019
Brookdale Danville	Executive Director I	000695077	Glenda	Bertucci	7/1/2019	
Brookdale Diablo Lodge	Business Office Manager	000438815	Holly	Musta	7/7/2014	8/9/2018
Brookdale Diablo Lodge	Business Office Manager	000443479	Francine	Taitano	8/11/2011	7/12/2019
Brookdale Diablo Lodge	Health & Wellness Director	000484264	Patricia	Oliver	3/3/2015	6/29/2018
Brookdale Diablo Lodge	Health & Wellness Director	000587134	Navjinder	Kaur	2/20/2017	
Brookdale Diablo Lodge	Health & Wellness Director	000605789	Derrick	Nguyen	6/23/2017	2/28/2020
Brookdale Diablo Lodge	Business Office Manager	000651041	Rachael	Davis	6/11/2018	
Brookdale Diablo Lodge	Health & Wellness Director	000656350	Hazel	Castro	7/23/2018	9/9/2019
Brookdale Diablo Lodge	Executive Director I	000427314	Jennifer	Coons	8/1/2011	6/8/2015
Brookdale Diablo Lodge	Executive Director I	000499755	William	Grady	6/8/2015	
Brookdale Diablo Lodge	Executive Director II	000499755	William	Grady	6/8/2015	
Brookdale Elk Grove	Health & Wellness Director	000430754	Nicole	Hemenover	11/11/2008	10/14/2016

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Elk Grove	Health & Wellness Director	000433921	Liza	King	8/13/2012	3/16/2017
Brookdale Elk Grove	Business Office Manager	000435208	Susie	Sarria	6/30/2008	1/31/2021
Brookdale Elk Grove	Health & Wellness Director	000451865	Kuldip	Singh	4/10/2014	1/31/2021
Brookdale Elk Grove	Executive Director I	000069687	Zachary	Butcher	2/14/2011	
Brookdale Elk Grove	Executive Director I	000427320	Brenda	Chappell	8/1/2005	5/13/2016
Brookdale Elk Grove	Executive Director I	000427343	Ricky	David	12/29/2006	8/23/2016
Brookdale Elk Grove	Executive Director I	000443641	Neal	Torres	2/20/2012	1/5/2018
Brookdale Elk Grove	Executive Director II	000458536	Jerica	Howard	8/21/2014	12/1/2020
Brookdale Elk Grove	Executive Director I	000682928	Jennifer	Scarberry	3/18/2019	3/16/2021
Brookdale Elk Grove	Executive Director II	000682928	Jennifer	Scarberry	3/18/2019	3/16/2021
Brookdale Fairfield AL/MC (CA)	Health & Wellness Director	000235298	Maninderpal	Bains	7/5/2005	6/18/2015
Brookdale Fairfield AL/MC (CA)	Health & Wellness Director	000505792	Karen	Muni	7/27/2015	2/26/2016
Brookdale Fairfield AL/MC (CA)	Health & Wellness Director	000542868	Esmeralda	Granados-Morebeck	4/4/2016	3/17/2017
Brookdale Fairfield AL/MC (CA)	Health & Wellness Director	000592715	Jolena	Padilla	3/20/2017	1/31/2019
Brookdale Fairfield AL/MC (CA)	Health & Wellness Director	000618059	Maria Socorro	Collado	10/10/2017	3/1/2018
Brookdale Fairfield AL/MC (CA)	Executive Director II	000322491	Tracy	Freudendahl	3/29/2010	11/2/2018
Brookdale Fairfield AL/MC (CA)	Executive Director II	000454321	Priscilla	Nolen-Holmes	8/1/2014	3/14/2018
Brookdale Fairfield AL/MC (CA)	Health & Wellness Director	000592715	Jolena	Padilla	3/20/2017	1/31/2019
Brookdale Fairfield AL/MC (CA)	Executive Director II	000343114	James	Hall	4/18/2011	1/31/2019
Brookdale Folsom	Health & Wellness Director	000439795	Nishi	Chand	2/21/2012	5/28/2015
Brookdale Folsom	Health & Wellness Director	000451865	Kuldip	Singh	4/10/2014	1/31/2021
Brookdale Folsom	Health & Wellness Director	000479535	Ashley	Silva	1/19/2015	8/11/2015
Brookdale Folsom	Health & Wellness Director	000513797	Alisha	Mercer	9/14/2015	9/14/2015
Brookdale Folsom	Health & Wellness Director	000534922	Georgia	Cruz	2/5/2016	11/20/2020
Brookdale Folsom	Health & Wellness Director	000740710	Harpinder	Kaur	11/23/2020	12/14/2020
Brookdale Folsom	Health & Wellness Director	000743932	Brianna	Brown	2/1/2021	
Brookdale Folsom	Executive Director I	000427348	Carie	Baker	4/8/2013	5/15/2019
Brookdale Folsom	Executive Director I	000442093	Melissa	Brown	6/2/2014	8/18/2019
Brookdale Folsom	Executive Director II	000442093	Melissa	Brown	6/2/2014	8/18/2019
Brookdale Folsom	Executive Director I	000473553	Jim	Sidoti	11/12/2014	9/17/2015
Brookdale Folsom	Executive Director I	000571682	Matthew	Horstmann	10/10/2016	4/5/2018
Brookdale Folsom	Executive Director II	000719223	Kristine	Clawson	3/11/2020	
Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000452556	Courtney	Gillam	9/24/2013	10/22/2015
Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000483020	Sherril	Denny	2/16/2015	6/25/2020



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Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000484531	Kellie	Mann	2/23/2015	12/11/2015
Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000484531	Kellie	Mann	2/23/2015	12/11/2015
Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000533324	Robin	Nelson	1/25/2016	11/15/2016
Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000582413	Erica	Polk	1/3/2017	1/31/2019
Brookdale Fortuna AL/MC (CA)	Executive Director I	000427110	Ida	Heinen	12/23/2013	7/30/2015
Brookdale Fortuna AL/MC (CA)	Executive Director I	000521988	Roger	Endert	11/2/2015	1/31/2019
Brookdale Fortuna AL/MC (CA)	Health & Wellness Director	000582413	Erica	Polk	1/3/2017	1/31/2019
Brookdale Fortuna AL/MC (CA)	Executive Director I	000521988	Roger	Endert	11/2/2015	1/31/2019
Brookdale Fountaingrove	Health & Wellness Director	000388670	Ashley	Krajewski-Farley	3/13/2013	6/9/2015
Brookdale Fountaingrove	Business Office Manager	000428520	Maria	Nepomuceno Cortes	1/13/2009	
Brookdale Fountaingrove	Business Office Manager	000434338	Lori	Marquez	2/7/2014	6/30/2016
Brookdale Fountaingrove	Health & Wellness Director	000453853	Mallorie	Cummings	4/11/2014	9/18/2016
Brookdale Fountaingrove	Health & Wellness Director	000507590	Heather	Anderson	7/28/2015	5/31/2019
Brookdale Fountaingrove	Health & Wellness Director	000582246	Allison	Pratt	1/9/2017	1/11/2019
Brookdale Fountaingrove	Executive Director III	000426595	Susan	Ramsey	2/18/2011	2/24/2017
Brookdale Fountaingrove	Executive Director III	000599601	Ferdinand Augustus	Buot	5/31/2017	5/6/2019
Brookdale Fountaingrove	Health & Wellness Director	000582246	Allison	Pratt	1/9/2017	1/11/2019
Brookdale Fountaingrove	Health & Wellness Director	000632476	Alma	Castilleja	1/17/2018	5/31/2019
Brookdale Fountaingrove	Health & Wellness Director	000683607	Megan	Rose	3/18/2019	4/10/2019
Brookdale Fountaingrove	Executive Director III	000599601	Ferdinand Augustus	Buot	5/31/2017	5/6/2019
Brookdale Fremont	Health & Wellness Director	000431884	Karishma	Morgan	1/27/2010	6/20/2016
Brookdale Fremont	Health & Wellness Director	000569500	Krissy	Roberto	9/26/2016	6/8/2017
Brookdale Fremont	Health & Wellness Director	000621349	Maria Genalyn	Austria	10/23/2017	1/30/2018
Brookdale Fremont	Health & Wellness Director	000649507	Prabjot	Shergill	6/4/2018	8/19/2018
Brookdale Fremont	Health & Wellness Director	000659686	Mustafa	Mojadidi	8/19/2018	1/31/2019
Brookdale Fremont	Executive Director II	000427357	Dimple	Kamdar	11/3/2012	1/31/2019
Brookdale Fremont	Health & Wellness Director	000659686	Mustafa	Mojadidi	8/19/2018	1/31/2019
Brookdale Fremont	Executive Director II	000427357	Dimple	Kamdar	11/3/2012	1/31/2019
Brookdale Fresno	Health & Wellness Director	000389281	Laurie	Johnson	4/2/2013	1/6/2019
Brookdale Fresno	Executive Director II	000357207	Jose	Castillo	12/12/2011	2/20/2020

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Brookdale Fresno	Executive Director II	000414513	Jennifer	Fowler	3/3/2014	3/21/2018
Brookdale Garden Grove	Business Office Manager	000165246	Patricia	Jimenez	1/1/2004	
Brookdale Garden Grove	Health & Wellness Director	000224765	Heidi	Reid	3/22/2004	8/28/2018
Brookdale Garden Grove	Health & Wellness Director	000437146	Jutta	Fairchild	1/19/2014	11/29/2016
Brookdale Garden Grove	Business Office Manager	000484688	Patricia	McCracken	2/23/2015	5/14/2019
Brookdale Garden Grove	Health & Wellness Director	000546059	Heather	Lopez	4/26/2016	1/31/2021
Brookdale Garden Grove	Business Office Manager	000561832	Vy	Lam	8/4/2016	1/2/2017
Brookdale Garden Grove	Health & Wellness Director	000590085	Sandra	Acosta-Louer	3/15/2017	8/23/2017
Brookdale Garden Grove	Health & Wellness Director	000615403	Dennis	Santos	9/5/2017	11/17/2017
Brookdale Garden Grove	Health & Wellness Director	000627108	Johanna	Rosiles	12/4/2017	3/14/2018
Brookdale Garden Grove	Health & Wellness Director	000654819	Dollie	Bedolla	7/6/2018	10/17/2019
Brookdale Garden Grove	Health & Wellness Director	000682971	Hanofi	Edogiawerie	3/12/2019	
Brookdale Garden Grove	Executive Director I	000426944	Violet	Lazarescu	9/9/2013	1/11/2019
Brookdale Garden Grove	Executive Director I	000427354	Nestor	Eligio	4/8/2013	8/18/2017
Brookdale Garden Grove	Executive Director I	000617716	Pamela	Junge	9/25/2017	1/13/2020
Brookdale Garden Grove	Executive Director II	000617716	Pamela	Junge	9/25/2017	1/13/2020
Brookdale Garden Grove	Executive Director II	000665491	Robert	Jakini	9/26/2018	12/3/2020
Brookdale Gardens of Tarzana	Business Office Manager	000271271	Nananne	Eichermueller	10/8/2007	
Brookdale Gardens of Tarzana	Health & Wellness Director	000296567	Vivian	Reyes	10/28/2008	2/21/2017
Brookdale Gardens of Tarzana	Health & Wellness Director	000418386	Ethel	Paulino	4/22/2014	1/24/2018
Brookdale Gardens of Tarzana	Health & Wellness Director	000496821	Beverly	Diaz	5/18/2015	8/26/2017
Brookdale Gardens of Tarzana	Health & Wellness Director	000617025	Hasmik	Sargsyan	9/14/2017	
Brookdale Gardens of Tarzana	Health & Wellness Director	000635856	Jerson	Ragasa	2/14/2018	7/5/2019
Brookdale Gardens of Tarzana	Business Office Manager	000720252	Mariam	Gezalian	3/3/2020	
Brookdale Gardens of Tarzana	Executive Director I	000053191	Meri	Vejar	11/28/2006	4/28/2017
Brookdale Gardens of Tarzana	Executive Director I	000245536	Jennifer	Boligan	5/22/2006	6/3/2018
Brookdale Gardens of Tarzana	Executive Director I	000289411	Sharon	Bates	7/22/2008	6/19/2015
Brookdale Gardens of Tarzana	Executive Director I	000506913	Lea	Bogoyevac	8/10/2015	4/8/2016
Brookdale Gardens of Tarzana	Executive Director II	000594640	Lilit	Mnatsakanyan	4/10/2017	

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Brookdale Gardens of Tarzana	Executive Director I	000652691	Robert	Goldberg	6/26/2018	6/13/2019
Brookdale Glendale	Health & Wellness Director	000245536	Jennifer	Boligan	5/22/2006	6/3/2018
Brookdale Glendale	Business Office Manager	000477415	Melissa	Lindamood	12/29/2014	1/11/2017
Brookdale Glendale	Business Office Manager	000493041	Kathy	Rodriguez	4/27/2015	5/31/2017
Brookdale Glendale	Health & Wellness Director	000546800	Sharon	Henry	5/1/2016	11/18/2016
Brookdale Glendale	Health & Wellness Director	000580060	Rowena	Garcia	12/12/2016	2/20/2017
Brookdale Glendale	Executive Director I	000245536	Jennifer	Boligan	5/22/2006	6/3/2018
Brookdale Glendale	Executive Director I	000426631	Scott	Eckstein	8/30/2013	2/23/2016
Brookdale Glendale	Executive Director I	000498476	Olga	Rayo-Kirksey	6/15/2015	
Brookdale Grand Terrace	Health & Wellness Director	000431446	Tanya	Collins	12/19/2011	7/7/2015
Brookdale Grand Terrace	Business Office Manager	000437230	Terrie	Encinas	4/19/2010	
Brookdale Grand Terrace	Business Office Manager	000438269	Mayra	Perez	3/12/2006	12/16/2019
Brookdale Grand Terrace	Health & Wellness Director	000454772	Danica	Turner	8/1/2014	5/22/2019
Brookdale Grand Terrace	Health & Wellness Director	000526098	Nichole	Hernandez	11/30/2015	12/16/2019
Brookdale Grand Terrace	Health & Wellness Director	000546542	Brittney	Martinez	4/26/2016	
Brookdale Grand Terrace	Health & Wellness Director	000550994	Dawn	Monahan	5/29/2016	3/9/2018
Brookdale Grand Terrace	Health & Wellness Director	000565674	Citali	Angeles	8/26/2016	1/23/2020
Brookdale Grand Terrace	Health & Wellness Director	000645416	Patricia	Krenelka Odle	4/30/2018	8/31/2018
Brookdale Grand Terrace	Executive Director I	000426529	Dale	Woytek	2/20/2012	9/11/2017
Brookdale Grand Terrace	Executive Director II	000427037	Theresa	Ward	5/8/2006	
Brookdale Grand Terrace	Executive Director I	000432341	Lorena	Patlan	5/9/2007	
Brookdale Grand Terrace	Executive Director II	000432341	Lorena	Patlan	5/9/2007	
Brookdale Grand Terrace	Executive Director I	000434419	Lucinda	Adams	6/27/2006	
Brookdale Grand Terrace	Executive Director II	000437634	Megan	Miller Trabucco	6/17/2005	12/16/2019
Brookdale Greenhaven	Health & Wellness Director	000451865	Kuldip	Singh	4/10/2014	1/31/2021
Brookdale Greenhaven	Health & Wellness Director	000524858	Curtis	Swedlow	12/2/2015	5/29/2016
Brookdale Greenhaven	Health & Wellness Director	000537931	Nancy	Valenzuela	2/26/2016	11/1/2016
Brookdale Greenhaven	Health & Wellness Director	000552612	Amber	Fraser	6/6/2016	
Brookdale Greenhaven	Health & Wellness Director	000581110	Christina	Godoy	12/27/2016	2/2/2017
Brookdale Greenhaven	Executive Director I	000427348	Carie	Baker	4/8/2013	5/15/2019

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Brookdale Greenhaven	Executive Director I	000432384	Dena	Hadden	11/20/2006	1/31/2019
Brookdale Greenhaven	Executive Director I	000518491	Yvonne	Vazquez	10/26/2015	6/16/2016
Brookdale Greenhaven	Executive Director I	000559181	Eleina	Ridolfi	8/3/2016	12/29/2016
Brookdale Greenhaven	Executive Director I	000585659	Shannon	Baker	2/6/2017	9/11/2017
Brookdale Greenhaven	Health & Wellness Director	000552612	Amber	Fraser	6/6/2016	
Brookdale Greenhaven	Executive Director I	000432384	Dena	Hadden	11/20/2006	1/31/2019
Brookdale Hemet	Health & Wellness Director	000436868	Karen	Roper	3/13/2014	8/31/2017
Brookdale Hemet	Health & Wellness Director	000525466	Judith	Pierfax	11/30/2015	
Brookdale Hemet	Health & Wellness Director	000542428	Liberty	Rapada	3/29/2016	5/25/2017
Brookdale Hemet	Health & Wellness Director	000564152	Camille	Bertrand	8/21/2016	12/4/2016
Brookdale Hemet	Executive Director I	000386275	Christopher	Black	2/7/2013	7/18/2017
Brookdale Hemet	Executive Director I	000444623	Janeth	Medrano	1/13/2009	12/13/2016
Brookdale Irvine	Health & Wellness Director	000309029	Bernadette	Sajia	7/13/2009	12/30/2016
Brookdale Irvine	Business Office Manager	000363974	Selene	Lopez	3/27/2012	3/20/2016
Brookdale Irvine	Business Office Manager	000435648	Araceli	Lopez	10/19/2004	
Brookdale Irvine	Health & Wellness Director	000467014	Michael	Arceo	8/17/2012	
Brookdale Irvine	Health & Wellness Director	000522873	Kathleen Kaye	Panganiban	11/9/2015	6/13/2018
Brookdale Irvine	Business Office Manager	000535532	Yennie	Mach	2/10/2016	4/25/2017
Brookdale Irvine	Health & Wellness Director	000573841	Vickie	Allen	10/24/2016	3/8/2018
Brookdale Irvine	Business Office Manager	000597282	Ferlina	McBride	4/26/2017	1/28/2018
Brookdale Irvine	Business Office Manager	000636664	Danielle	Hauseman	2/16/2018	
Brookdale Irvine	Health & Wellness Director	000645431	Kimberly	Hutcherson Griffin	4/30/2018	6/18/2019
Brookdale Irvine	Business Office Manager	000709042	Jacqueline	Vincent	11/4/2019	5/19/2020
Brookdale Irvine	Executive Director I	000333247	Apolinario	Gozon	10/13/2010	7/8/2016
Brookdale Irvine	Executive Director II	000435077	Carrie	Galloway	2/15/2010	
Brookdale Irvine	Executive Director I	000561236	Jennifer	Turgeon	7/31/2016	9/15/2018
Brookdale Irvine	Executive Director I	000663802	Bonnie	Christie	10/9/2018	10/31/2019
Brookdale Irvine	Executive Director II	000663802	Bonnie	Christie	10/9/2018	10/31/2019
Brookdale Kettleman Lane	Health & Wellness Director	000392799	Jessica	Zamora	4/25/2013	
Brookdale Kettleman Lane	Health & Wellness Director	000454418	Kadijatu	Barrie	8/1/2014	
Brookdale Kettleman Lane	Health & Wellness Director	000596594	Sara	Mackedsy	4/28/2017	



Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Kettleman Lane	Health & Wellness Director	000596594	Sara	Mackedsy	4/28/2017	
Brookdale Kettleman Lane	Health & Wellness Director	000714650	Emily	Walthall	1/21/2020	7/17/2020
Brookdale Kettleman Lane	Executive Director I	000359767	Danielle	Dobler	1/8/2012	11/25/2016
Brookdale Kettleman Lane	Executive Director I	000434409	Mary Margaret	Chappell	9/17/2012	
Brookdale Kettleman Lane	Executive Director I	000454321	Priscilla	Nolen-Holmes	8/1/2014	3/14/2018
Brookdale Lodi	Health & Wellness Director	000359767	Danielle	Dobler	1/8/2012	11/25/2016
Brookdale Lodi	Health & Wellness Director	000374036	Hansel	Taasin	7/31/2012	8/28/2019
Brookdale Lodi	Health & Wellness Director	000489599	Marci	Patrick	4/12/2015	6/2/2016
Brookdale Lodi	Health & Wellness Director	000552612	Amber	Fraser	6/6/2016	
Brookdale Lodi	Health & Wellness Director	000556033	Vanessa	Windham	6/28/2016	4/1/2017
Brookdale Lodi	Executive Director I	000368410	Jessica	Pryor	5/30/2012	4/29/2016
Brookdale Lodi	Executive Director I	000540422	Estee	Nowak	3/22/2016	4/13/2018
Brookdale Lodi	Executive Director I	000571682	Matthew	Horstmann	10/10/2016	4/5/2018
Brookdale Lodi	Executive Director I	000645415	Cathy	Otte	5/1/2018	8/9/2019
Brookdale Loma Linda	Health & Wellness Director	000155859	Debbie	Garibaldi	4/20/1999	8/23/2016
Brookdale Loma Linda	Business Office Manager	000433065	James	Landrum	11/15/2011	
Brookdale Loma Linda	Health & Wellness Director	000454772	Danica	Turner	8/1/2014	5/22/2019
Brookdale Loma Linda	Business Office Manager	000495934	Stephanie	Creer	5/12/2015	4/12/2019
Brookdale Loma Linda	Health & Wellness Director	000546542	Brittney	Martinez	4/26/2016	
Brookdale Loma Linda	Health & Wellness Director	000570617	Desiree	Davidson	10/3/2016	8/17/2017
Brookdale Loma Linda	Business Office Manager	000590569	Sarah	Mesa	3/6/2017	4/17/2019
Brookdale Loma Linda	Health & Wellness Director	000617261	Katrina	Cato	9/18/2017	12/5/2018
Brookdale Loma Linda	Business Office Manager	000637140	Mary	Revolorio	2/20/2018	
Brookdale Loma Linda	Executive Director I	000426807	Lori	Spencer	8/31/2009	8/25/2016
Brookdale Loma Linda	Executive Director I	000434419	Lucinda	Adams	6/27/2006	
Brookdale Loma Linda	Executive Director II	000434419	Lucinda	Adams	6/27/2006	
Brookdale Loma Linda	Executive Director I	000561296	Tomi	Morales	7/29/2016	11/30/2018
Brookdale Magnolia	Health & Wellness Director	000069877	Antarpreet	Kang	9/17/2007	
Brookdale Magnolia	Health & Wellness Director	000069877	Antarpreet	Kang	10/19/2014	
Brookdale Magnolia	Business Office Manager	000168517	Maritza	Lujan	12/28/1999	

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Brookdale Magnolia	Health & Wellness Director	000434133	Danielle	Schrenk	11/22/2013	11/2/2017
Brookdale Magnolia	Health & Wellness Director	000573950	Blasia	Lee-Lole	10/24/2016	2/28/2021
Brookdale Magnolia	Health & Wellness Director	000622056	Kelley	Jeffries	10/23/2017	7/27/2020
Brookdale Magnolia	Health & Wellness Director	000718289	Michelle	Gonzales	2/11/2020	1/1/2021
Brookdale Magnolia	Business Office Manager	000725359	Vanessa	De Robles	5/7/2020	9/2/2020
Brookdale Magnolia	Business Office Manager	000738569	Diana	Gonzalez	10/26/2020	2/28/2021
Brookdale Magnolia	Executive Director II	000168517	Maritza	Lujan	12/28/1999	
Brookdale Magnolia	Executive Director II	000427187	Brenda	Awe Eggers	12/30/2013	9/21/2017
Brookdale Magnolia	Executive Director II	000623109	Sarah	DeVore	11/15/2017	
Brookdale Magnolia	Executive Director II	000724871	Mary	McClure	5/1/2020	2/28/2021
Brookdale Manteca	Health & Wellness Director	000431595	Brenda	Martinez Castano	1/31/2013	7/16/2015
Brookdale Manteca	Health & Wellness Director	000441762	Laurie	Burkart	5/19/2014	10/5/2016
Brookdale Manteca	Health & Wellness Director	000452608	Jennifer	Rosas	1/28/2014	2/26/2016
Brookdale Manteca	Health & Wellness Director	000452608	Jennifer	Rosas	1/28/2014	2/26/2016
Brookdale Manteca	Health & Wellness Director	000575630	Danielle	Velarde	11/15/2016	1/31/2019
Brookdale Manteca	Executive Director I	000269139	Marielouise	Harris	8/27/2007	
Brookdale Manteca	Executive Director I	000426802	Sharon	Monck	11/17/2011	
Brookdale Manteca	Executive Director I	000509347	Gary	Lunsford	8/24/2015	11/27/2015
Brookdale Manteca	Health & Wellness Director	000575630	Danielle	Velarde	11/15/2016	1/31/2019
Brookdale Manteca	Executive Director I	000269139	Marielouise	Harris	8/27/2007	
Brookdale Mirage Inn	Health & Wellness Director	000012494	Carmen	Magdaleno	12/20/2005	9/3/2015
Brookdale Mirage Inn	Business Office Manager	000403546	Veronica	Sotelo	9/25/2013	9/23/2016
Brookdale Mirage Inn	Business Office Manager	000444714	Jessalette	Castro	4/24/2010	
Brookdale Mirage Inn	Health & Wellness Director	000523042	Martina	Lerma	11/9/2015	2/12/2018
Brookdale Mirage Inn	Health & Wellness Director	000642607	Ivana	Maksimovic	4/11/2018	8/2/2020
Brookdale Mirage Inn	Health & Wellness Director	000680663	Glenda	De Leos	2/11/2019	8/9/2020
Brookdale Mirage Inn	Health & Wellness Director	000684683	Robert	Stansbury	3/27/2019	10/21/2019
Brookdale Mirage Inn	Health & Wellness Director	000734908	Victor	Sandoval	9/28/2020	
Brookdale Mirage Inn	Executive Director III	000642607	Ivana	Maksimovic	4/11/2018	8/2/2020
Brookdale Mirage Inn	Executive Director III	000736856	Usbaldo	Martinez	10/5/2020	
Brookdale Mirage Inn	Executive Director I	000174635	David	Tamo	4/10/2000	8/10/2018
Brookdale Mirage Inn	Executive Director I	000349468	John	Redford	8/15/2011	5/30/2016

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Brookdale Mirage Inn	Executive Director I	000601243	John	Spaun	5/29/2017	4/23/2019
Brookdale Mirage Inn	Executive Director I	000642607	Ivana	Maksimovic	4/11/2018	8/2/2020
Brookdale Monrovia	Health & Wellness Director	000241561	Dora	Sanchez - Nazar	4/3/2006	4/20/2018
Brookdale Monrovia	Health & Wellness Director	000284323	Margaret	Grancich	5/5/2008	9/28/2017
Brookdale Monrovia	Health & Wellness Director	000560082	Alison	Pastores	7/25/2016	
Brookdale Monrovia	Business Office Manager	000584288	Tracey	Holder	1/16/2017	
Brookdale Monrovia	Business Office Manager	000605362	Diana	Marquez	6/21/2017	
Brookdale Monrovia	Health & Wellness Director	000725936	Hollie	Shuler	5/25/2020	
Brookdale Monrovia	Executive Director I	000070128	Kawana	Anthony	12/1/2008	9/20/2018
Brookdale Monrovia	Executive Director I	000512436	Jill	Johnson	9/8/2015	10/7/2016
Brookdale Monrovia	Executive Director I	000560082	Alison	Pastores	7/25/2016	
Brookdale Monrovia	Executive Director I	000574042	Jill	Troedson	12/5/2016	10/15/2017
Brookdale Monrovia	Executive Director I	000575311	Ralph	Balbin	11/15/2016	
Brookdale Murrieta	Health & Wellness Director	000069877	Antarpreet	Kang	9/17/2007	
Brookdale Murrieta	Health & Wellness Director	000069877	Antarpreet	Kang	10/19/2014	
Brookdale Murrieta	Health & Wellness Director	000476042	Sheree	Gordon	1/5/2015	12/10/2018
Brookdale Murrieta	Health & Wellness Director	000666967	Kelly	Kendrick	10/15/2018	3/31/2019
Brookdale Murrieta	Health & Wellness Director	000684839	Jennifer	Larsen	4/1/2019	
Brookdale Murrieta	Health & Wellness Director	000261750	Queen	Ayers	8/1/2005	
Brookdale Murrieta	Executive Director I	000261750	Queen	Ayers	7/10/2016	
Brookdale Murrieta	Executive Director II	000261750	Queen	Ayers	6/30/2019	
Brookdale Murrieta	Executive Director I	000317744	Lyn	Lenderman	12/28/2009	6/17/2016
Brookdale Napa	Health & Wellness Director	000398591	Ann	Clayton	7/22/2013	4/25/2020
Brookdale Napa	Health & Wellness Director	000454321	Priscilla	Nolen-Holmes	8/1/2014	3/14/2018
Brookdale Napa	Business Office Manager	000473901	Anja	Jones	12/1/2014	
Brookdale Napa	Health & Wellness Director	000483020	Sherril	Denny	2/16/2015	6/25/2020
Brookdale Napa	Health & Wellness Director	000498398	Maria	Bui	6/15/2015	2/23/2016
Brookdale Napa	Health & Wellness Director	000544785	Paul	Brown	4/18/2016	2/7/2017
Brookdale Napa	Health & Wellness Director	000712097	Lorie	Bittles	12/2/2019	3/12/2021
Brookdale Napa	Executive Director I	000366945	Jim	Cunningham	5/14/2012	3/12/2021
Brookdale Napa	Executive Director II	000366945	Jim	Cunningham	5/14/2012	3/12/2021
Brookdale Napa	Executive Director I	000454321	Priscilla	Nolen-Holmes	8/1/2014	3/14/2018
Brookdale Napa	Executive Director I	000485139	Laura	Bourret	3/9/2015	11/17/2017
Brookdale Napa	Executive Director I	000576130	Misty	Whitt	11/28/2016	9/11/2018

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Brookdale Napa	Executive Director II	000674946	Steven	Mattingly	12/17/2018	1/27/2021
Brookdale Nohl Ranch	Business Office Manager	000331334	Shannon	Moore	9/7/2010	12/22/2016
Brookdale Nohl Ranch	Business Office Manager	000347640	Ashley	Becker	7/6/2011	6/25/2019
Brookdale Nohl Ranch	Health & Wellness Director	000358387	Denise	Leek	1/4/2012	7/12/2016
Brookdale Nohl Ranch	Health & Wellness Director	000398470	Michelle	Angcaco	7/19/2013	
Brookdale Nohl Ranch	Health & Wellness Director	000404781	Sonia	Reyes	10/10/2013	12/11/2016
Brookdale Nohl Ranch	Health & Wellness Director	000419302	Nicole	Atkinson	5/6/2014	12/18/2015
Brookdale Nohl Ranch	Business Office Manager	000424666	Adrienne	Kellums	7/10/2014	7/18/2015
Brookdale Nohl Ranch	Business Office Manager	000434556	Lisabelle	Paranda	4/30/2007	
Brookdale Nohl Ranch	Health & Wellness Director	000546059	Heather	Lopez	4/26/2016	1/31/2021
Brookdale Nohl Ranch	Executive Director I	000405015	Lana	Hammers	10/28/2013	
Brookdale Nohl Ranch	Executive Director II	000405015	Lana	Hammers	10/28/2013	
Brookdale North Bay	Business Office Manager	000438402	Marcia	Sales	11/13/2013	1/31/2019
Brookdale North Bay	Health & Wellness Director	000444170	Wilma	Carriere	9/8/2003	1/31/2019
Brookdale North Bay	Health & Wellness Director	000588213	Therese	Cuevas	2/21/2017	5/18/2018
Brookdale North Bay	Health & Wellness Director	000651816	Lisa	Hetherington	6/29/2018	8/24/2018
Brookdale North Bay	Executive Director I	000426441	Richard	Lieberman	7/21/2008	10/15/2015
Brookdale North Bay	Executive Director I	000454321	Priscilla	Nolen-Holmes	8/1/2014	3/14/2018
Brookdale North Bay	Executive Director I	000485139	Laura	Bourret	3/9/2015	11/17/2017
Brookdale North Bay	Executive Director I	000509814	Nomalanga	Malik	8/31/2015	12/5/2018
Brookdale North Bay	Business Office Manager	000438402	Marcia	Sales	11/13/2013	1/31/2019
Brookdale North Bay	Health & Wellness Director	000671987	Michelle	Cabrera	11/21/2018	1/31/2019
Brookdale North Bay	Executive Director I	000509814	Nomalanga	Malik	8/31/2015	12/5/2018
Brookdale North Bay	Executive Director I	000674941	Juliana	Williams	12/17/2018	1/31/2019
Brookdale North Euclid	Business Office Manager	000430907	Marco	Ramos	9/1/1998	
Brookdale North Euclid	Health & Wellness Director	000437932	Bernadette	Castorena	12/27/2013	3/24/2019
Brookdale North Euclid	Health & Wellness Director	000439832	Jennifer	Siegel	7/11/2011	12/30/2016
Brookdale North Euclid	Health & Wellness Director	000477745	Yosseline	Villalobos	12/29/2014	
Brookdale North Euclid	Health & Wellness Director	000517553	Joanne	Terrell	10/5/2015	8/26/2016
Brookdale North Euclid	Health & Wellness Director	000571355	Alma	Alvarez	10/4/2016	8/31/2017
Brookdale North Euclid	Health & Wellness Director	000573533	Kimberley	Stotmore	10/31/2016	3/30/2017



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Brookdale North Euclid	Health & Wellness Director	000687413	Mirian	Im	4/22/2019	2/14/2020
Brookdale North Euclid	Executive Director I	000321006	Kameshi	Taylor	3/1/2010	12/13/2019
Brookdale North Euclid	Executive Director II	000321006	Kameshi	Taylor	3/1/2010	12/13/2019
Brookdale North Euclid	Executive Director I	000427352	Nicole	Wentworth	6/24/2004	4/14/2017
Brookdale North Euclid	Executive Director II	000608774	Lisa	To	7/31/2017	
Brookdale North Fremont	Health & Wellness Director	000298977	Angela	Johnson	1/1/2009	4/3/2020
Brookdale North Fremont	Health & Wellness Director	000454376	Kimberley	Lyell	8/1/2014	11/14/2015
Brookdale North Fremont	Health & Wellness Director	000475024	Ramandeep	Kaur	12/1/2014	2/29/2016
Brookdale North Fremont	Health & Wellness Director	000721610	William	Bertucci	3/23/2020	12/16/2020
Brookdale North Fremont	Health & Wellness Director	000737768	Brigette	Najjar	10/26/2020	3/4/2021
Brookdale North Fremont	Executive Director I	000004076	Grace Ndomo	Gichane	7/14/2004	
Brookdale North Fremont	Executive Director I	000270059	Odette	Colondres	9/10/2007	
Brookdale North Fremont	Executive Director I	000427142	Adaline	Kiehn	4/5/2010	12/11/2020
Brookdale North Fremont	Executive Director I	000499755	William	Grady	6/8/2015	
Brookdale North Fremont	Executive Director I	000510200	Steve	Millard	8/17/2015	9/7/2017
Brookdale North Fremont	Executive Director I	000745164	Lady	Reed	2/14/2021	
Brookdale North Tarzana	Health & Wellness Director	000286140	Anchiriza	Concepcion	5/25/2008	
Brookdale North Tarzana	Health & Wellness Director	000435932	Denise	Lugo	1/9/2014	11/1/2015
Brookdale North Tarzana	Business Office Manager	000449499	Tamara	Aikens	6/1/2013	9/5/2017
Brookdale North Tarzana	Health & Wellness Director	000502757	Gail	Santucci	7/6/2015	8/9/2015
Brookdale North Tarzana	Health & Wellness Director	000506744	Romeo	Angeles	7/23/2015	4/13/2017
Brookdale North Tarzana	Health & Wellness Director	000514746	Janell	Starks	9/14/2015	10/4/2018
Brookdale North Tarzana	Business Office Manager	000612777	Susan	Wilson	8/20/2017	
Brookdale North Tarzana	Executive Director I	000414624	Thomas	Rekowski	3/17/2014	
Brookdale North Tarzana	Executive Director I	000426950	Cyntia	Drachenberg	1/11/2011	6/26/2015
Brookdale North Tarzana	Executive Director I	000506548	Jodi	Kanowitz	7/23/2015	7/7/2016
Brookdale North Tarzana	Executive Director I	000569633	Steven	Cope	9/26/2016	4/17/2017
Brookdale North Tarzana	Executive Director I	000594640	Lilit	Mnatsakanyan	4/10/2017	

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Brookdale North Tarzana	Executive Director II	000687551	Dina	Davis	4/29/2019	
Brookdale Northridge	Health & Wellness Director	000437127	Mary	Ty	8/18/2003	8/30/2017
Brookdale Northridge	Health & Wellness Director	000453811	Karen	Marin	2/18/2014	6/10/2019
Brookdale Northridge	Health & Wellness Director	000565277	Patricia	Miller	8/24/2016	1/15/2020
Brookdale Northridge	Health & Wellness Director	000714213	Jocelyn	Aquino	12/26/2019	
Brookdale Northridge	Executive Director III	000426894	Cynthia	Pachorek	6/2/2014	6/10/2019
Brookdale Northridge	Executive Director III	000698151	Varsenik	Keshishyan	8/19/2019	
Brookdale Northridge	Health & Wellness Director	000714213	Jocelyn	Aquino	12/26/2019	
Brookdale Northridge	Executive Director III	000698151	Varsenik	Keshishyan	8/19/2019	
Brookdale Ocean House	Health & Wellness Director	000353474	Maria Rosario	Roleda	10/12/2011	
Brookdale Ocean House	Business Office Manager	000398356	Terri	Kurtz	7/18/2013	7/4/2017
Brookdale Ocean House	Business Office Manager	000611209	Stacy	Carbajal	8/1/2017	11/29/2019
Brookdale Ocean House	Business Office Manager	000719505	Adam	Syncheff	2/25/2020	
Brookdale Ocean House	Executive Director I	000009180	Edward	Silva	6/10/2005	
Brookdale Ocean House	Executive Director II	000414624	Thomas	Rekowski	3/17/2014	
Brookdale Ocean House	Executive Director I	000544186	Thomas	Park	4/12/2016	12/5/2020
Brookdale Ocean House	Executive Director II	000544186	Thomas	Park	4/12/2016	12/5/2020
Brookdale Ocean House	Executive Director II	000544186	Thomas	Park	4/12/2016	12/5/2020
Brookdale Oceanside	Business Office Manager	000407507	Deborah	Couch	11/13/2013	1/29/2016
Brookdale Oceanside	Health & Wellness Director	000444666	Lashanda	Daniels	6/18/2012	7/24/2015
Brookdale Oceanside	Health & Wellness Director	000454376	Kimberley	Lyell	8/1/2014	11/14/2015
Brookdale Oceanside	Health & Wellness Director	000454772	Danica	Turner	8/1/2014	5/22/2019
Brookdale Oceanside	Health & Wellness Director	000529234	Sarah	Wheeler	12/23/2015	3/29/2018
Brookdale Oceanside	Business Office Manager	000537691	Candi	Laird	2/25/2016	
Brookdale Oceanside	Health & Wellness Director	000593478	Mario	Preston	4/5/2017	7/30/2018
Brookdale Oceanside	Health & Wellness Director	000659829	Kristal	McIntosh	8/16/2018	2/21/2019
Brookdale Oceanside	Health & Wellness Director	000695015	Daniel	Williams	7/8/2019	5/11/2020
Brookdale Oceanside	Health & Wellness Director	000707231	Shannon	Hastings	10/23/2019	10/28/2020

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Brookdale Oceanside	Health & Wellness Director	000742272	Yvonne	Brazelton	12/28/2020	
Brookdale Oceanside	Executive Director I	000205390	Laura	Eckert	5/1/2002	
Brookdale Oceanside	Executive Director II	000205390	Laura	Eckert	5/1/2002	
Brookdale Oceanside	Executive Director I	000426406	Karen	Enciso	1/11/2011	7/15/2016
Brookdale Oceanside	Executive Director II	000636664	Danielle	Hauseman	2/16/2018	
Brookdale Orange	Business Office Manager	000468862	Graciela Flor	Vega	10/13/2014	1/6/2016
Brookdale Orange	Health & Wellness Director	000498600	Karen	Ashley	6/1/2015	8/3/2015
Brookdale Orange	Executive Director I	000427071	Melanie	Washington	7/23/2012	1/25/2017
Brookdale Orangevale	Health & Wellness Director	000427913	Bettina	Barter	2/22/2012	6/19/2016
Brookdale Orangevale	Business Office Manager	000453335	Ashley	Goetz	8/6/2012	9/9/2019
Brookdale Orangevale	Health & Wellness Director	000568184	Zandra	Robinson	9/19/2016	11/14/2016
Brookdale Orangevale	Health & Wellness Director	000573039	Desseree	Pritchett	10/13/2016	1/15/2017
Brookdale Orangevale	Health & Wellness Director	000585733	Maria	Pena	2/7/2017	4/18/2017
Brookdale Orangevale	Executive Director I	000427343	Ricky	David	12/29/2006	8/23/2016
Brookdale Orangevale	Executive Director I	000453335	Ashley	Goetz	8/6/2012	9/9/2019
Brookdale Orangevale	Health & Wellness Director	000578069	Matthew	Hernandez	12/5/2016	9/9/2019
Brookdale Orangevale	Health & Wellness Director	000585733	Maria	Pena	2/7/2017	4/18/2017
Brookdale Orangevale	Health & Wellness Director	000599417	Eva	Bowlin	5/15/2017	4/12/2019
Brookdale Orangevale	Executive Director I	000453335	Ashley	Goetz	8/6/2012	9/9/2019
Brookdale Palm Springs	Health & Wellness Director	000432244	Shane	Stuart-Ramirez	3/29/2005	1/26/2016
Brookdale Palm Springs	Business Office Manager	000444714	Jessalette	Castro	4/24/2010	
Brookdale Palm Springs	Health & Wellness Director	000503545	Kristine	Co	7/2/2015	12/22/2015
Brookdale Palm Springs	Health & Wellness Director	000516954	Christine	Caballero	9/28/2015	9/30/2016
Brookdale Palm Springs	Health & Wellness Director	000576346	Catja	Fleck	11/14/2016	5/24/2017
Brookdale Palm Springs	Health & Wellness Director	000588965	Brittany	Benard	2/22/2017	1/23/2018
Brookdale Palm Springs	Executive Director I	000174635	David	Tamo	4/10/2000	8/10/2018
Brookdale Palm Springs	Executive Director I	000422032	Krystal	Jenkins	6/6/2014	3/16/2018
Brookdale Palm Springs	Executive Director I	000427037	Theresa	Ward	5/8/2006	
Brookdale Palm Springs	Health & Wellness Director	000474115	Allison	Ortiz	11/26/2014	5/31/2018

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Brookdale Palm Springs	Health & Wellness Director	000588965	Brittany	Benard	2/22/2017	1/23/2018
Brookdale Palm Springs	Executive Director I	000540422	Estee	Nowak	3/22/2016	4/13/2018
Brookdale Palm Springs	Executive Director I	000646388	Cristina	Miller	5/28/2018	5/31/2018
Brookdale Paso Robles	Business Office Manager	000435010	Kelly	Dawson	7/5/2013	6/10/2015
Brookdale Paso Robles	Business Office Manager	000444502	Krystal	Cleveland	12/8/2008	1/31/2019
Brookdale Paso Robles	Health & Wellness Director	000473971	Corina	Segundo	11/24/2014	1/31/2019
Brookdale Paso Robles	Business Office Manager	000505433	Dawn	Sims	7/14/2015	6/1/2016
Brookdale Paso Robles	Business Office Manager	000508142	Erika	Lopez	7/31/2015	1/31/2019
Brookdale Paso Robles	Business Office Manager	000553745	Susan	Barrett	6/13/2016	11/11/2016
Brookdale Paso Robles	Business Office Manager	000567451	Sarah	Eddings	9/8/2016	3/31/2017
Brookdale Paso Robles	Business Office Manager	000591996	Erin	Newman	3/17/2017	9/6/2017
Brookdale Paso Robles	Business Office Manager	000620509	Sharon	Ray	10/9/2017	1/18/2018
Brookdale Paso Robles	Executive Director I	000357199	Cheryl	Marsh	12/19/2011	3/30/2018
Brookdale Paso Robles	Executive Director I	000649504	Michael	Mayfield	6/4/2018	1/31/2019
Brookdale Paso Robles	Health & Wellness Director	000473971	Corina	Segundo	11/24/2014	1/31/2019
Brookdale Paso Robles	Business Office Manager	000508142	Erika	Lopez	7/31/2015	1/31/2019
Brookdale Paso Robles	Health & Wellness Director	000618201	Sherry	McCormick	9/12/2017	1/31/2019
Brookdale Paso Robles	Executive Director I	000649504	Michael	Mayfield	6/4/2018	1/31/2019
Brookdale Paulin Creek	Business Office Manager	000009073	Wendy	Trigueros	6/10/2005	
Brookdale Paulin Creek	Health & Wellness Director	000060375	Regilyn	Balliao	9/17/2007	
Brookdale Paulin Creek	Health & Wellness Director	000354735	Alejandra	Sallee	11/7/2011	
Brookdale Paulin Creek	Health & Wellness Director	000452723	Martha	Nkhoma	7/2/2012	3/11/2021
Brookdale Paulin Creek	Health & Wellness Director	000616629	Tola	Magee	9/11/2017	11/18/2020
Brookdale Paulin Creek	Health & Wellness Director	000743016	Shelby	Beem	1/4/2021	
Brookdale Paulin Creek	Executive Director III	000512905	Robert	Alvarado	9/2/2015	
Brookdale Paulin Creek	Executive Director III	000612369	Christina	Alonzo	8/9/2017	
Brookdale Paulin Creek	Executive Director II	000301927	Scott	Carlson	3/16/2009	12/1/2017
Brookdale Paulin Creek	Executive Director II	000427094	Martin	Herter	7/21/2014	5/20/2016



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Brookdale Paulin Creek	Executive Director II	000525076	Angela	Boucher Turin	12/14/2015	11/30/2018
Brookdale Paulin Creek	Executive Director II	000564493	Cathy	Allen	9/14/2016	7/14/2017
Brookdale Paulin Creek	Executive Director II	000612369	Christina	Alonzo	8/9/2017	
Brookdale Rancho Mirage	Health & Wellness Director	000434500	Victoria	Chung	10/22/2010	8/2/2015
Brookdale Rancho Mirage	Health & Wellness Director	000495193	Marquita	Richards	5/6/2015	9/28/2017
Brookdale Rancho Mirage	Health & Wellness Director	000526126	Bryan	Voskeritchian	11/13/2015	11/2/2018
Brookdale Rancho Mirage	Health & Wellness Director	000559921	Joanne	Miller	7/24/2016	10/28/2016
Brookdale Rancho Mirage	Health & Wellness Director	000586110	Tara	Gonzalez	2/1/2017	12/12/2019
Brookdale Rancho Mirage	Health & Wellness Director	000669870	Ryan	West	10/30/2018	6/30/2020
Brookdale Rancho Mirage	Health & Wellness Director	000703548	Chardonnay	Blue	9/12/2019	1/31/2021
Brookdale Rancho Mirage	Executive Director III	000427037	Theresa	Ward	5/8/2006	
Brookdale Rancho Mirage	Executive Director III	000564294	Craig	Lark	8/21/2016	5/30/2017
Brookdale Rancho Mirage	Executive Director III	000582325	Mark	Schroepfer	1/23/2017	12/28/2017
Brookdale Rancho Mirage	Executive Director III	000660118	Robert	Barton	8/20/2018	9/24/2019
Brookdale Rancho Mirage	Executive Director III	000713998	Dwayne	Davis	1/16/2020	1/31/2021
Brookdale Red Bluff	Health & Wellness Director	000483020	Sherril	Denny	2/16/2015	6/25/2020
Brookdale Red Bluff	Health & Wellness Director	000516993	Anthony	Sanchez	10/5/2015	4/30/2018
Brookdale Red Bluff	Executive Director I	000461317	Kelly	Molatore	8/18/2014	6/7/2017
Brookdale Red Bluff	Health & Wellness Director	000371094	Susan	Todd	6/20/2012	6/30/2020
Brookdale Red Bluff	Health & Wellness Director	000516993	Anthony	Sanchez	10/5/2015	4/30/2018
Brookdale Red Bluff	Executive Director I	000431088	Esmeralda	Matlock	5/28/2013	6/30/2020
Brookdale Red Bluff	Executive Director I	000461317	Kelly	Molatore	8/18/2014	6/7/2017
Brookdale Redwood City	Health & Wellness Director	000004076	Grace Ndomo	Gichane	7/14/2004	
Brookdale Redwood City	Business Office Manager	000273586	Raul	Ramos	10/30/2007	
Brookdale Redwood City	Health & Wellness Director	000277025	Stephanie	Rivera	12/26/2007	2/3/2017
Brookdale Redwood City	Health & Wellness Director	000516235	Ana	Wilson	10/5/2015	5/21/2020
Brookdale Redwood City	Health & Wellness Director	000669006	Karina	Luna	10/22/2018	4/5/2020
Brookdale Redwood City	Health & Wellness Director	000705056	John	Gamboa	9/30/2019	12/17/2019
Brookdale Redwood City	Health & Wellness Director	000725344	Rebekah	Dilag	5/11/2020	
Brookdale Redwood City	Executive Director III	000004076	Grace Ndomo	Gichane	7/14/2004	

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Brookdale Redwood City	Executive Director II	000004076	Grace Ndomo	Gichane	7/14/2004	
Brookdale Redwood City	Executive Director II	000407226	Alan	Fox	11/21/2013	7/10/2015
Brookdale Redwood City	Executive Director II	000509348	Katherine	Tazawa	8/17/2015	12/8/2017
Brookdale Riverside	Health & Wellness Director	000434419	Lucinda	Adams	6/27/2006	
Brookdale Riverside	Business Office Manager	000484688	Patricia	McCracken	2/23/2015	5/14/2019
Brookdale Riverside	Executive Director I	000204879	Christina	Matsumoto	4/15/2002	
Brookdale Riverside	Executive Director I	000454772	Danica	Turner	8/1/2014	5/22/2019
Brookdale Riverside	Executive Director I	000561296	Tomi	Morales	7/29/2016	11/30/2018
Brookdale Riverside	Health & Wellness Director	000434419	Lucinda	Adams	6/27/2006	
Brookdale Riverside	Health & Wellness Director	000476042	Sheree	Gordon	1/5/2015	12/10/2018
Brookdale Riverside	Business Office Manager	000484688	Patricia	McCracken	2/23/2015	5/14/2019
Brookdale Riverside	Health & Wellness Director	000680663	Glenda	De Leos	2/11/2019	8/9/2020
Brookdale Riverside	Executive Director I	000444095	Cynthia	Garcia	9/22/2008	1/31/2021
Brookdale Riverside	Executive Director I	000454772	Danica	Turner	8/1/2014	5/22/2019
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000244346	Martha	Fernandez De Hoban	12/16/2005	
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000282945	Denise	Maytubby	4/8/2008	
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000282945	Denise	Maytubby	4/8/2008	
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000476042	Sheree	Gordon	1/5/2015	12/10/2018
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000608628	Mary	Roman	7/12/2017	6/17/2020
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000623007	Chrystal	Grimes	11/6/2017	10/16/2018
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000654442	Melissa	Camberos	7/9/2018	1/18/2019
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000663157	Darlene	Romero	9/10/2018	3/5/2019
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000698082	Stacy	Box	8/13/2019	10/18/2019
Brookdale Riverwalk IL/AL/MC	Health & Wellness Director	000718599	Silvia	Martinez	2/14/2020	
Brookdale Riverwalk IL/AL/MC	Executive Director III	000258857	Jeffrey	Toomer	1/29/2007	
Brookdale Riverwalk IL/AL/MC	Executive Director III	000551811	Erika	Castile	6/14/2016	3/28/2021
Brookdale Riverwalk IL/AL/MC	Executive Director III	000643528	Reg	Webster	4/16/2018	
Brookdale Riverwalk IL/AL/MC	Executive Director IV	000643528	Reg	Webster	4/16/2018	
Brookdale Riverwalk IL/AL/MC	Business Office Manager	000244136	Darnell	Evans	7/16/2003	
Brookdale Rohnert Park	Health & Wellness Director	000468225	Kerrilynn	Soldavini	10/6/2014	11/9/2015

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Rohnert Park	Health & Wellness Director	000478002	Aaron	Mendioro	12/31/2014	3/23/2017
Brookdale Rohnert Park	Health & Wellness Director	000495595	Trulynia	Coiner	5/18/2015	9/14/2016
Brookdale Rohnert Park	Health & Wellness Director	000519652	Jane	Torres	10/19/2015	6/24/2016
Brookdale Rohnert Park	Business Office Manager	000575929	Felicia	Spencer	11/7/2016	10/22/2018
Brookdale Rohnert Park	Health & Wellness Director	000593934	Cristy	Natoli	4/5/2017	1/31/2019
Brookdale Rohnert Park	Executive Director II	000354735	Alejandra	Sallee	11/7/2011	
Brookdale Rohnert Park	Executive Director II	000525076	Angela	Boucher Turin	12/14/2015	11/30/2018
Brookdale Rohnert Park	Executive Director II	000576130	Misty	Whitt	11/28/2016	9/11/2018
Brookdale Rohnert Park	Business Office Manager	000455538	Maria	Solorio Hernandez	8/5/2014	1/31/2019
Brookdale Rohnert Park	Business Office Manager	000575929	Felicia	Spencer	11/7/2016	10/22/2018
Brookdale Rohnert Park	Health & Wellness Director	000593934	Cristy	Natoli	4/5/2017	1/31/2019
Brookdale Rohnert Park	Executive Director II	000613466	Amanda	Martino	8/17/2017	1/31/2019
Brookdale Roseville	Health & Wellness Director	000503798	J.R.	Vega	7/13/2015	9/4/2016
Brookdale Roseville	Health & Wellness Director	000564737	Irene	Bolante	8/30/2016	3/20/2018
Brookdale Roseville	Health & Wellness Director	000656488	Sherrie	Kuar	7/30/2018	
Brookdale Roseville	Health & Wellness Director	000675987	Janette	Bordeau	1/7/2019	5/8/2019
Brookdale Roseville	Health & Wellness Director	000695014	Diana	Turner	7/8/2019	10/20/2019
Brookdale Roseville	Health & Wellness Director	000715252	Jocelyn	Lorenzo	1/13/2020	2/22/2020
Brookdale Roseville	Executive Director I	000427108	Mayra	Voet	7/28/2005	3/20/2018
Brookdale Roseville	Executive Director I	000431800	Danielle	Kocsis	6/20/2013	10/22/2018
Brookdale Roseville	Executive Director I	000432524	Kayla	Davis	8/9/2010	10/15/2018
Brookdale Roseville	Executive Director I	000442093	Melissa	Brown	6/2/2014	8/18/2019
Brookdale Roseville	Executive Director I	000656488	Sherrie	Kuar	7/30/2018	
Brookdale Salinas	Health & Wellness Director	000437402	Kristoffer	Palamos	12/18/2012	4/10/2017
Brookdale Salinas	Health & Wellness Director	000446389	Angela	Bloom	1/2/2013	4/21/2017
Brookdale Salinas	Business Office Manager	000471859	Maria	Zesati	11/8/2014	11/3/2017
Brookdale Salinas	Health & Wellness Director	000484476	Alisia	Colston	2/23/2015	1/3/2021
Brookdale Salinas	Business Office Manager	000519757	Sandra	Ealy	10/16/2015	
Brookdale Salinas	Health & Wellness Director	000521989	Claudia	Pizano	11/9/2015	8/15/2016
Brookdale Salinas	Health & Wellness Director	000567068	Misty	Breach	9/20/2016	12/2/2017

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Brookdale Salinas	Health & Wellness Director	000610054	Markie	Cheatham	7/31/2017	2/1/2018
Brookdale Salinas	Executive Director I	000446389	Angela	Bloom	1/2/2013	4/21/2017
Brookdale Salinas	Executive Director I	000597149	Paul	Harrison	5/1/2017	1/6/2020
Brookdale Salinas	Executive Director I	000682357	Joy	Carter	3/6/2019	
Brookdale Salinas	Business Office Manager	000519757	Sandra	Ealy	10/16/2015	
Brookdale Salinas	Health & Wellness Director	000692337	Karla	Del Castillo	6/18/2019	
Brookdale Salinas	Business Office Manager	000709268	Maria	Perez	11/5/2019	
Brookdale Salinas	Executive Director I	000682357	Joy	Carter	3/6/2019	
Brookdale Salinas	Executive Director II	000682357	Joy	Carter	3/6/2019	
Brookdale San Dimas	Health & Wellness Director	000453142	Kathleen	Mahoney	12/9/2002	7/31/2019
Brookdale San Dimas	Executive Director III	000426930	Kara	Kneedy-Cayem	4/25/2011	8/31/2020
Brookdale San Dimas	Health & Wellness Director	000453142	Kathleen	Mahoney	12/9/2002	7/31/2019
Brookdale San Dimas	Health & Wellness Director	000453285	Taisha	DeCorse	9/20/2004	8/31/2020
Brookdale San Dimas	Health & Wellness Director	000669870	Ryan	West	10/30/2018	6/30/2020
Brookdale San Dimas	Executive Director III	000426930	Kara	Kneedy-Cayem	4/25/2011	8/31/2020
Brookdale San Jose	Health & Wellness Director	000298977	Angela	Johnson	1/1/2009	4/3/2020
Brookdale San Jose	Health & Wellness Director	000543753	Hiteaxben	Desai	4/18/2016	4/11/2017
Brookdale San Jose	Health & Wellness Director	000624353	Geraldine	Veras	11/6/2017	
Brookdale San Jose	Health & Wellness Director	000636248	Jenica	San Juan	3/12/2018	6/4/2018
Brookdale San Jose	Health & Wellness Director	000657948	Christine Mae	Banglay	8/13/2018	4/2/2019
Brookdale San Jose	Health & Wellness Director	000684529	Marianne	Trimor	4/1/2019	4/26/2019
Brookdale San Jose	Health & Wellness Director	000745186	Harriette	Vega	2/8/2021	
Brookdale San Jose	Executive Director III	000269139	Marielouise	Harris	8/27/2007	
Brookdale San Jose	Executive Director II	000269139	Marielouise	Harris	8/27/2007	
Brookdale San Jose	Executive Director II	000282948	Michele	Merritt	4/14/2008	10/20/2020
Brookdale San Juan Capistrano	Health & Wellness Director	000219536	Elly	Arbianto	8/13/2003	1/31/2021
Brookdale San Juan Capistrano	Health & Wellness Director	000439525	Alejandro	Aranda	1/15/2013	1/4/2020
Brookdale San Juan Capistrano	Health & Wellness Director	000546059	Heather	Lopez	4/26/2016	1/31/2021
Brookdale San Juan Capistrano	Health & Wellness Director	000547266	Sulema	Zuniga-Alvarez	5/22/2016	9/23/2016
Brookdale San Juan Capistrano	Executive Director III	000427126	Robert	Koontz	5/20/2013	8/10/2018
Brookdale San Juan Capistrano	Executive Director III	000473755	Terri	DeBoever	11/17/2014	12/1/2016
Brookdale San Juan Capistrano	Executive Director III	000564294	Craig	Lark	8/21/2016	5/30/2017



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Brookdale San Juan Capistrano	Executive Director III	000604235	Brian	Rougeux	6/19/2017	2/15/2018
Brookdale San Juan Capistrano	Executive Director III	000646713	Robert	Daynes	5/28/2018	3/20/2020
Brookdale San Juan Capistrano	Executive Director III	000727756	Joseph	Franz	6/15/2020	1/31/2021
Brookdale San Marcos	Business Office Manager	000255036	Brandy	Warner	11/6/2006	4/1/2016
Brookdale San Marcos	Health & Wellness Director	000301810	Kimberly	Severson	2/23/2009	7/5/2016
Brookdale San Marcos	Health & Wellness Director	000420741	Carol	Elder	5/22/2014	
Brookdale San Marcos	Health & Wellness Director	000525466	Judith	Pierfax	11/30/2015	
Brookdale San Marcos	Business Office Manager	000554501	Joe	Webber	6/20/2016	2/13/2017
Brookdale San Marcos	Business Office Manager	000588156	Deborah	Spence	2/15/2017	
Brookdale San Marcos	Health & Wellness Director	000602986	David	Alspach	6/23/2017	2/5/2019
Brookdale San Marcos	Executive Director III	000211826	Mary	Heilgeist	11/13/2002	
Brookdale San Marcos	Executive Director II	000211826	Mary	Heilgeist	11/13/2002	
Brookdale San Marcos	Executive Director II	000335867	Robert	May	11/29/2010	10/26/2015
Brookdale San Marcos	Executive Director II	000426405	Laurie	Tomasello	4/10/2007	7/20/2016
Brookdale San Pablo	Health & Wellness Director	000497022	Flordeliza	Fuson	5/19/2015	9/14/2015
Brookdale San Pablo	Health & Wellness Director	000516235	Ana	Wilson	10/5/2015	5/21/2020
Brookdale San Pablo	Health & Wellness Director	000587134	Navjinder	Kaur	2/20/2017	
Brookdale San Pablo	Executive Director I	000426586	Lance	Mishleau	6/23/2014	8/17/2015
Brookdale San Pablo	Executive Director I	000458536	Jerica	Howard	8/21/2014	12/1/2020
Brookdale San Pablo	Executive Director II	000458536	Jerica	Howard	8/21/2014	12/1/2020
Brookdale San Pablo	Executive Director I	000518184	Merryn	Oliveira	10/6/2015	2/17/2016
Brookdale San Pablo	Executive Director II	000674946	Steven	Mattingly	12/17/2018	1/27/2021
Brookdale San Ramon	Health & Wellness Director	000301810	Kimberly	Severson	2/23/2009	7/5/2016
Brookdale San Ramon	Health & Wellness Director	000440444	Marian	Manuel	7/30/1999	3/12/2020
Brookdale San Ramon	Health & Wellness Director	000565189	Glorio	Navarra	8/29/2016	
Brookdale San Ramon	Health & Wellness Director	000670319	Alysa	Servida	11/12/2018	
Brookdale San Ramon	Health & Wellness Director	000681607	La Vera	Foster	2/25/2019	8/30/2019
Brookdale San Ramon	Health & Wellness Director	000736127	Robert	Arthur	9/22/2020	

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Brookdale San Ramon	Executive Director I	000358399	Shawn	Cull	12/14/2011	8/26/2020
Brookdale San Ramon	Executive Director I	000427094	Martin	Herter	7/21/2014	5/20/2016
Brookdale San Ramon	Executive Director I	000427102	Jill	Peers	8/20/2012	4/21/2016
Brookdale San Ramon	Executive Director I	000510200	Steve	Millard	8/17/2015	9/7/2017
Brookdale San Ramon	Executive Director II	000734143	Anna	Reddy	8/31/2020	
Brookdale Santa Monica Gardens	Business Office Manager	000244267	Julie	Manzanares	4/25/2005	
Brookdale Santa Monica Gardens	Health & Wellness Director	000381582	Jamie	Roxas	11/26/2012	5/18/2019
Brookdale Santa Monica Gardens	Health & Wellness Director	000469930	Zenita	Klass	10/29/2014	8/16/2018
Brookdale Santa Monica Gardens	Health & Wellness Director	000561390	Kristoffer Kevin	Jorgensen	8/1/2016	
Brookdale Santa Monica Gardens	Health & Wellness Director	000661929	Keith	Bernabe	9/3/2018	8/9/2019
Brookdale Santa Monica Gardens	Health & Wellness Director	000683218	Jonathan	Sosa	3/25/2019	11/1/2020
Brookdale Santa Monica Gardens	Executive Director I	000316710	Michael	Emerson	12/1/2009	6/6/2019
Brookdale Santa Monica Gardens	Executive Director II	000575311	Ralph	Balbin	11/15/2016	
Brookdale Santa Monica Gardens	Executive Director I	000693121	Madeline	Fry	6/17/2019	2/10/2020
Brookdale Scotts Valley	Health & Wellness Director	000340138	Estella	Soto	2/22/2011	3/18/2016
Brookdale Scotts Valley	Health & Wellness Director	000391609	Leticia	Perez	4/13/2013	9/15/2017
Brookdale Scotts Valley	Health & Wellness Director	000478002	Aaron	Mendioro	12/31/2014	3/23/2017
Brookdale Scotts Valley	Health & Wellness Director	000484476	Alisia	Colston	2/23/2015	1/3/2021
Brookdale Scotts Valley	Health & Wellness Director	000502261	Janet	Melberg	6/23/2015	2/15/2019
Brookdale Scotts Valley	Business Office Manager	000713640	Elizabeth	Reynaga	12/22/2019	
Brookdale Scotts Valley	Health & Wellness Director	000714749	Dakota	Nichols	1/3/2020	
Brookdale Scotts Valley	Executive Director III	000269139	Marielouise	Harris	8/27/2007	
Brookdale Scotts Valley	Executive Director III	000590650	Antonette	Edwards	3/5/2017	
Brookdale Scotts Valley	Executive Director III	000597149	Paul	Harrison	5/1/2017	1/6/2020
Brookdale Scotts Valley	Executive Director II	000322491	Tracy	Freudendahl	3/29/2010	11/2/2018
Brookdale Scotts Valley	Executive Director II	000363469	Ruth	Elliott	3/12/2012	
Brookdale Scotts Valley	Executive Director II	000597149	Paul	Harrison	5/1/2017	1/6/2020
Brookdale Scotts Valley	Executive Director II	000611374	Miriam	Sunglao	8/14/2017	1/10/2019

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Brookdale Sonoma	Health & Wellness Director	000452391	Mark Anthony	Manzon	6/9/2014	2/17/2017
Brookdale Sonoma	Health & Wellness Director	000518191	Tedra	Richardson	10/5/2015	2/26/2016
Brookdale Sonoma	Health & Wellness Director	000563403	Maria	Cuevas	8/12/2016	8/21/2018
Brookdale Sonoma	Health & Wellness Director	000649844	Jocelyn	Vahle	6/11/2018	1/2/2019
Brookdale Sonoma	Executive Director II	000336867	Melon	Rivera	12/3/2010	11/28/2018
Brookdale Sonoma	Executive Director II	000427350	Wendy	Cornejo	12/31/2005	3/4/2016
Brookdale Sonoma	Executive Director II	000540436	Diane	Wright	4/4/2016	1/31/2019
Brookdale Sonoma	Health & Wellness Director	000649844	Jocelyn	Vahle	6/11/2018	1/2/2019
Brookdale Sonoma	Executive Director II	000336867	Melon	Rivera	12/3/2010	11/28/2018
Brookdale Sonoma	Executive Director II	000674946	Steven	Mattingly	12/17/2018	1/27/2021
Brookdale Sterling Court	Health & Wellness Director	000433633	Kathleen	Rhodes	2/22/2009	3/2/2019
Brookdale Sterling Court	Health & Wellness Director	000492899	Amy	Bryan	4/22/2015	12/20/2015
Brookdale Sterling Court	Health & Wellness Director	000528904	Colleen	Karlin	12/18/2015	12/22/2016
Brookdale Sterling Court	Health & Wellness Director	000681478	Flint John	Maranan	2/21/2019	1/15/2020
Brookdale Sterling Court	Health & Wellness Director	000718663	Allison	Lopez	2/24/2020	1/31/2021
Brookdale Sterling Court	Executive Director I	000427138	Tracy	Da Oro	6/17/2013	9/18/2015
Brookdale Sterling Court	Executive Director I	000518466	Kristine	Reymont	10/7/2015	2/27/2017
Brookdale Sterling Court	Executive Director I	000542918	Josef	Dunham	4/4/2016	12/19/2019
Brookdale Sterling Court	Executive Director II	000542918	Josef	Dunham	4/4/2016	12/19/2019
Brookdale Sterling Court	Executive Director II	000564327	Carol	Dowell	8/22/2016	1/8/2021
Brookdale Stock Ranch Road	Health & Wellness Director	000440320	Anne Marie	Ampalayo	1/27/2012	1/31/2019
Brookdale Stock Ranch Road	Health & Wellness Director	000536085	Ma Liza	Gatera	2/22/2016	12/27/2018
Brookdale Stock Ranch Road	Executive Director I	000069687	Zachary	Butcher	2/14/2011	
Brookdale Stock Ranch Road	Executive Director I	000426367	Thomas	Coffey	10/14/2013	3/24/2016
Brookdale Stock Ranch Road	Executive Director I	000427181	Diana	Engle	9/9/2009	5/20/2017
Brookdale Stock Ranch Road	Executive Director I	000440320	Anne Marie	Ampalayo	1/27/2012	1/31/2019
Brookdale Stock Ranch Road	Health & Wellness Director	000536085	Ma Liza	Gatera	2/22/2016	12/27/2018
Brookdale Stock Ranch Road	Health & Wellness Director	000677083	Victoria	Kerr	1/14/2019	
Brookdale Stock Ranch Road	Executive Director I	000440320	Anne Marie	Ampalayo	1/27/2012	1/31/2019
Brookdale Stockton	Health & Wellness Director	000434156	Jill	Lawas	8/13/2012	8/27/2019

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Brookdale Stockton	Health & Wellness Director	000575247	Yanet	Rico-Monrroy	11/1/2016	1/31/2019
Brookdale Stockton	Executive Director I	000427102	Jill	Peers	8/20/2012	4/21/2016
Brookdale Stockton	Executive Director I	000443641	Neal	Torres	2/20/2012	1/5/2018
Brookdale Stockton	Executive Director I	000540436	Diane	Wright	4/4/2016	1/31/2019
Brookdale Stockton	Health & Wellness Director	000575247	Yanet	Rico-Monrroy	11/1/2016	1/31/2019
Brookdale Stockton	Executive Director I	000540436	Diane	Wright	4/4/2016	1/31/2019
Brookdale Sunwest IL/AL/MC	Business Office Manager	000214141	Ashley	Fife	2/15/2003	
Brookdale Sunwest IL/AL/MC	Business Office Manager	000508496	Susan	Hayden	8/3/2015	12/11/2015
Brookdale Sunwest IL/AL/MC	Executive Director III	000427037	Theresa	Ward	5/8/2006	
Brookdale Sunwest IL/AL/MC	Executive Director II	000174635	David	Tamo	4/10/2000	8/10/2018
Brookdale Sunwest IL/AL/MC	Executive Director II	000261751	Jennifer	Benner	2/9/2004	3/15/2017
Brookdale Sunwest IL/AL/MC	Executive Director II	000427037	Theresa	Ward	5/8/2006	
Brookdale Sunwest IL/AL/MC	Executive Director II	000498055	Troy	Byington	6/15/2015	
Brookdale Sunwest IL/AL/MC	Health & Wellness Director	000069877	Antarpreet	Kang	9/17/2007	
Brookdale Sunwest IL/AL/MC	Health & Wellness Director	000069877	Antarpreet	Kang	10/19/2014	
Brookdale Sunwest IL/AL/MC	Health & Wellness Director	000463279	Jeanine	Fojas	9/10/2014	11/25/2019
Brookdale Sunwest IL/AL/MC	Health & Wellness Director	000716683	Joel	Mcclure	2/10/2020	11/6/2020
Brookdale Sunwest IL/AL/MC	Health & Wellness Director	000720669	Juanita	Jackson	3/16/2020	
Brookdale Tracy	Health & Wellness Director	000432262	Leticia	Higares	6/2/2013	10/4/2019
Brookdale Tracy	Health & Wellness Director	000432262	Leticia	Higares	6/2/2013	10/4/2019
Brookdale Tracy	Health & Wellness Director	000497366	Sonia	Hernandez	5/20/2015	4/25/2018
Brookdale Tracy	Health & Wellness Director	000707718	Karen	Silva	11/11/2019	2/3/2021
Brookdale Tracy	Health & Wellness Director	000746538	Stephanie	Judd	3/4/2021	
Brookdale Tracy	Executive Director II	000270059	Odette	Colondres	9/10/2007	
Brookdale Tracy	Executive Director I	000427026	Richard	Flynn	9/1/2009	2/1/2019
Brookdale Tracy	Executive Director I	000427142	Adaline	Kiehn	4/5/2010	12/11/2020
Brookdale Tracy	Executive Director II	000427142	Adaline	Kiehn	4/5/2010	12/11/2020
Brookdale Uptown Whittier	Health & Wellness Director	000439311	Rose	Alcantara	8/19/2013	1/5/2020
Brookdale Uptown Whittier	Business Office Manager	000439352	Erlinda	Monzon	10/28/2010	
Brookdale Uptown Whittier	Health & Wellness Director	000587691	Danniluz	Arango	2/27/2017	
Brookdale Uptown Whittier	Executive Director I	000427217	Preciosa	Magpayo	10/18/2010	
Brookdale Uptown Whittier	Executive Director II	000427217	Preciosa	Magpayo	10/18/2010	



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Brookdale Vacaville	Health & Wellness Director	000453372	Margaret	Narciso	5/27/2008	8/21/2017
Brookdale Vacaville	Health & Wellness Director	000612164	Lyinda	Gillman	8/8/2017	4/1/2018
Brookdale Vacaville	Health & Wellness Director	000645970	Helen	Casas	5/2/2018	4/30/2019
Brookdale Vacaville	Executive Director I	000070128	Kawana	Anthony	12/1/2008	9/20/2018
Brookdale Vacaville	Executive Director I	000435552	Kimberly	Humphrey	8/12/2011	4/30/2019
Brookdale Vacaville	Executive Director I	000462825	Melissa	Eccles	9/8/2014	4/13/2016
Brookdale Vacaville	Executive Director I	000542918	Josef	Dunham	4/4/2016	12/19/2019
Brookdale Vacaville	Executive Director I	000629347	Robin	Stouder	1/15/2018	2/22/2019
Brookdale Vacaville LeisureTwn	Health & Wellness Director	000437599	Nadine	Franz	3/25/2014	8/26/2015
Brookdale Vacaville LeisureTwn	Health & Wellness Director	000517001	Nichole	Kindred	10/12/2015	7/17/2016
Brookdale Vacaville LeisureTwn	Health & Wellness Director	000561957	Roschelle	Factor	8/8/2016	
Brookdale Vacaville LeisureTwn	Executive Director II	000427082	Holly	Sullins	12/31/2005	1/31/2019
Brookdale Vacaville LeisureTwn	Health & Wellness Director	000561957	Roschelle	Factor	8/8/2016	
Brookdale Vacaville LeisureTwn	Executive Director II	000427082	Holly	Sullins	12/31/2005	1/31/2019
Brookdale Vallejo Hills	Health & Wellness Director	000452391	Mark Anthony	Manzon	6/9/2014	2/17/2017
Brookdale Vallejo Hills	Health & Wellness Director	000501360	Troy	Baena	6/22/2015	
Brookdale Vallejo Hills	Health & Wellness Director	000591048	Julie	Azanza	3/27/2017	11/13/2017
Brookdale Vallejo Hills	Health & Wellness Director	000616525	Veronica	De Leon	9/12/2017	1/31/2019
Brookdale Vallejo Hills	Executive Director II	000426441	Richard	Lieberman	7/21/2008	10/15/2015
Brookdale Vallejo Hills	Executive Director I	000485139	Laura	Bourret	3/9/2015	11/17/2017
Brookdale Vallejo Hills	Executive Director II	000499373	James	Cameron	6/15/2015	6/22/2018
Brookdale Vallejo Hills	Executive Director II	000516668	Sally	Schulz	10/7/2015	1/31/2019
Brookdale Vallejo Hills	Business Office Manager	000431654	Linda	Black	9/24/2003	1/31/2019
Brookdale Vallejo Hills	Health & Wellness Director	000616525	Veronica	De Leon	9/12/2017	1/31/2019
Brookdale Vallejo Hills	Executive Director II	000516668	Sally	Schulz	10/7/2015	1/31/2019
Brookdale Valley View	Health & Wellness Director	000444071	Esmiralda	Behonsky	6/1/1999	
Brookdale Valley View	Executive Director I	000012195	Wanda	Reynolds	11/21/2005	6/30/2017
Brookdale Valley View	Executive Director I	000426944	Violet	Lazarescu	9/9/2013	1/11/2019
Brookdale Valley View	Executive Director I	000674155	Daniel	Lines	1/7/2019	
Brookdale Valley View	Executive Director II	000674155	Daniel	Lines	1/7/2019	

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Brookdale Walnut	Health & Wellness Director	000431706	Michael	Alonzo	3/14/2014	8/17/2018
Brookdale Walnut	Health & Wellness Director	000437146	Jutta	Fairchild	1/19/2014	11/29/2016
Brookdale Walnut	Business Office Manager	000441474	Vanessa	Saldana	4/23/2013	11/30/2016
Brookdale Walnut	Business Office Manager	000477415	Melissa	Lindamood	12/29/2014	1/11/2017
Brookdale Walnut	Health & Wellness Director	000477745	Yosseline	Villalobos	12/29/2014	
Brookdale Walnut	Health & Wellness Director	000580916	Xavier	Santiago	12/26/2016	12/1/2020
Brookdale Walnut	Health & Wellness Director	000721090	Becky	Westlund	3/16/2020	2/7/2021
Brookdale Walnut	Executive Director I	000204879	Christina	Matsumoto	4/15/2002	
Brookdale Walnut	Executive Director II	000204879	Christina	Matsumoto	4/15/2002	
Brookdale Walnut	Executive Director I	000427145	Cynthia	Edwards	11/11/2013	4/19/2016
Brookdale Walnut	Health & Wellness Director	000721090	Becky	Westlund	3/16/2020	2/7/2021
Brookdale Walnut	Executive Director II	000204879	Christina	Matsumoto	4/15/2002	
Brookdale Walnut	Health & Wellness Director	000721090	Becky	Westlund	3/16/2020	2/7/2021
Brookdale Walnut	Executive Director II	000204879	Christina	Matsumoto	4/15/2002	
Brookdale Windsor	Health & Wellness Director	000307831	Anesha	Cook	6/19/2009	3/18/2018
Brookdale Windsor	Business Office Manager	000328052	Rosa	Trejo Gonzalez	7/2/2010	8/2/2018
Brookdale Windsor	Health & Wellness Director	000502823	Mon Albert	Colarines	6/26/2015	11/4/2020
Brookdale Windsor	Health & Wellness Director	000591600	Pedro	Analco	4/4/2017	6/20/2018
Brookdale Windsor	Health & Wellness Director	000640504	Timmery	Wallace	3/20/2018	
Brookdale Windsor	Health & Wellness Director	000654034	Jaclyn	Ramirez	7/19/2018	9/15/2018
Brookdale Windsor	Business Office Manager	000663336	Donald	Rodreick	9/9/2018	
Brookdale Windsor	Executive Director I	000268818	Stephanie	Limberg	8/23/2007	10/18/2019
Brookdale Windsor	Executive Director II	000358173	Wendy	Watson	12/27/2011	
Brookdale Windsor	Executive Director I	000452723	Martha	Nkhoma	7/2/2012	3/11/2021
Brookdale Windsor	Executive Director II	000452723	Martha	Nkhoma	7/2/2012	3/11/2021
Brookdale Yorba Linda	Health & Wellness Director	000358387	Denise	Leek	1/4/2012	7/12/2016
Brookdale Yorba Linda	Health & Wellness Director	000476042	Sheree	Gordon	1/5/2015	12/10/2018
Brookdale Yorba Linda	Executive Director III	000427015	Randall	Fuller	2/21/2011	4/7/2017
Brookdale Yorba Linda	Health & Wellness Director	000470185	Anna	Pastores	10/28/2014	8/7/2020
Brookdale Yorba Linda	Health & Wellness Director	000476042	Sheree	Gordon	1/5/2015	12/10/2018
Brookdale Yorba Linda	Executive Director III	000427015	Randall	Fuller	2/21/2011	4/7/2017
Brookdale Yorba Linda	Executive Director III	000427126	Robert	Koontz	5/20/2013	8/10/2018

Community Name	Job Code Description	Employee ID	First Name	Last Name	Original Hire Date	Termination Date
Brookdale Yorba Linda	Executive Director III	000614517	Carrey	Beers	9/11/2017	10/11/2019
Brookdale Yorba Linda	Executive Director III	000714560	Liyon	O'Quinn	1/21/2020	8/31/2020
Brookdale Yreka	Health & Wellness Director	000483635	Rachel	Baker	2/16/2015	9/14/2015
Brookdale Yreka	Health & Wellness Director	000536825	Elaine	Brauer	2/22/2016	1/31/2019
Brookdale Yreka	Executive Director I	000426998	M. Monique	Dixon	9/9/2013	12/24/2019
Brookdale Yreka	Executive Director I	000548856	Brian	Linsley	5/16/2016	11/21/2017
Brookdale Yreka	Health & Wellness Director	000536825	Elaine	Brauer	2/22/2016	1/31/2019
Brookdale Yreka	Health & Wellness Director	000641571	Ashley	Oredsen	5/14/2018	1/31/2019
Brookdale Yreka	Executive Director I	000536825	Elaine	Brauer	2/22/2016	1/31/2019
Cortona Park, CA	Health & Wellness Director	000358094	Sangeeta	Devi	1/3/2012	
Cortona Park, CA	Business Office Manager	000531831	Jose	Guizar-Oseguera	1/20/2016	7/28/2019
Cortona Park, CA	Business Office Manager	000698702	Stephanie	Pedrotti	8/2/2019	
Cortona Park, CA	Executive Director I	000308255	Agustin	Samaniego	12/22/2008	
Cortona Park, CA	Executive Director II	000308255	Agustin	Samaniego	12/22/2008	
Cortona Park, CA	Executive Director I	000377660	The Estate of Patricia	Mead	10/8/2012	9/30/2015

### **INTERROGATORY NO. 3:**

Please describe in detail the formula, system or methodology used by YOU to determine the hours, numbers or levels of caregiver staffing needed to provide PROMISED SERVICES to RESIDENTS of the FACILITIES. As used herein, PROMISED SERVICES means the services that are identified in RESIDENTS' Service Plans based on YOUR initial and periodic assessments of each RESIDENT'S needs.

### **RESPONSE TO NO. 3:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the terms "formula," "system," "methodology," and "Service Plans" are vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory that the term "PROMISED SERVICES" is overly broad, vague, unduly burdensome, and not proportional to the needs of this case, including to the

1 extent it incorporates the vague, ambiguous, and undefined term “Service Plans.” Brookdale further  
2 objects to this Interrogatory as unduly burdensome and not proportional to the needs of this case to the  
3 extent that it seeks a response as to each Promised Service, in each Service Plan, for each Resident, at  
4 each and every community at issue, many of which are no longer affiliated with Brookdale, over the  
5 course of the class period, as well as to the extent that, in order to provide a complete response to this  
6 Interrogatory as written, Brookdale would have to consult personnel at each of its communities to which  
7 this Interrogatory applies. Brookdale further objects to this Interrogatory on the grounds that it purports  
8 to require Brookdale to disclose information pertaining to the means or processes by which Brookdale  
9 utilizes information for business planning purposes. The underlying process that Brookdale utilizes with  
10 respect to operations data collected from its communities is highly proprietary and fundamental to its  
11 internal business operations, business model, and projected future performance. Disclosure of  
12 information pertaining to the unique method or process by which Brookdale makes its business  
13 decisions will unduly prejudice Brookdale because it constitutes a fundamental component of  
14 Brookdale’s competitive advantage. Brookdale further objects to this Interrogatory on the basis of  
15 attorney-client privilege, work product doctrine, self-critical analysis privilege, and the protections  
16 accorded subsequent remedial measures, or any other applicable privilege or protection. Brookdale  
17 further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories  
18 permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner’s Interrogatories  
19 Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete  
20 subparts. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set Two, Plaintiffs  
21 served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including  
22 discrete subparts.

23 Subject to and without waiving the foregoing objections and limitations, Brookdale responds as  
24 follows: The personnel at each of Brookdale’s individual communities determine the hours, numbers  
25 and levels of caregiver staffing based on their individual assessments and determinations relative to the  
26 individual needs of the particular residents at the community at any applicable period of time. (*See, e.g.*,  
27 Transcript of March 17, 2021, Deposition of Theresa Ward at 96:17-25 (“At [the] Sunwest” community,  
28



“what determines what we’re doing with our staffing has to do with what those needs of the residents are . . . and the frequency, what’s going on at any particular time and the frequency of what those services are.”); Transcript of March 18, 2021, Deposition of Kimia Ataeian at 175:10-176:8 (“I staff based on my residents’ need. . . . So based on the regulation there is enough staffing we need to have, I make sure those regulations are met. One other thing that I do when it comes to specifically about care, I make sure myself and Ninad [the Brookhurst Health and Wellness Director] oversee that. I will make sure that if there’s new residents, our caregivers are getting to them, you know, and what needs to be done if it’s getting done.”); Transcript of March 24, 2021, Deposition of Marie Harris at 177:19-178:8 (“It’s always about the resident’s need, making sure we can safely provide care for that resident” at the San Jose community, in response to the question, “what considerations are involved as you determine staffing for a shift?”, and agreeing that she “staff[s] according to provide the best care for each resident.”); Transcript of March 25, 2021, Deposition of Anna Reddy at 246:13-25 (“My nurse and I” at the San Ramon community “sit down and have a conversation about what our resident need [sic] and what our staffing needs are and then what the schedule is gonna look like.”).)

**INTERROGATORY NO. 4:**

Please IDENTIFY ALL written policies, procedures, guidelines, or other DOCUMENTS that govern or apply to the process of determining the hours, numbers or levels of caregiver staffing needed to provide PROMISED SERVICES to RESIDENTS of the FACILITIES. As used herein, PROMISED SERVICES means the services that are identified in RESIDENTS’ Service Plans based on YOUR initial and periodic assessments of each RESIDENT’S needs.

**RESPONSE TO NO. 4:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the term “Service Plans” is vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory that the term “PROMISED SERVICES” is overly broad, vague, unduly burdensome, and not proportional to the needs of this case, including to the extent it incorporates the vague, ambiguous, and undefined term “Service Plans.” Brookdale further objects to this Interrogatory as unduly

burdensome and not proportional to the needs of this case to the extent that it seeks a response as to each Promised Service, in each Service Plan, for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory on the grounds that it purports to require Brookdale to disclose information pertaining to the means or processes by which Brookdale utilizes information for business planning purposes. The underlying process that Brookdale utilizes with respect to operations data collected from its communities is highly proprietary and fundamental to its internal business operations, business model, and projected future performance. Disclosure of information pertaining to the unique method or process by which Brookdale makes its business decisions will unduly prejudice Brookdale because it constitutes a fundamental component of Brookdale's competitive advantage. Brookdale further objects to this Interrogatory on the basis of attorney-client privilege, work product doctrine, self-critical analysis privilege and the protections accorded subsequent remedial measures, or any other applicable privilege or protection. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: Brookdale has not identified any written policies, procedures, guidelines, or other documents that govern or apply to the process of determining the hours, numbers or levels of caregiver staffing needed to provide PROMISED SERVICES to Residents of the communities at issue following a diligent search and reasonable inquiry.

**INTERROGATORY NO. 5:**

Please state the total amount of COMMUNITY FEES billed to RESIDENTS at each FACILITY during the CLASS PERIOD.

**RESPONSE TO NO. 5:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the term “total amount” is vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent that it seeks a response for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: The total amount of community fees billed to Residents at the communities at issue for the time period of January 1, 2015, through December 31, 2020, is \$37,432,875.66.

**INTERROGATORY NO. 6:**

Please state the total amount of COMMUNITY FEES collected from or on behalf of all RESIDENTS pursuant to any RESIDENCY AGREEMENT during the CLASS PERIOD, net of any refunds.

**RESPONSE TO NO. 6:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the terms “total amount” and “refunds” are vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent that it seeks a response for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories

permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: Brookdale does not record the amounts collected from or on behalf of Residents by individual categories of fees. The total amount of payments collected from Residents at the communities at issue for the time period of January 1, 2015, through December 31, 2020, is \$2,044,134,545.68.

**INTERROGATORY NO. 7:**

Please state the total amount billed to all RESIDENTS for BASIC SERVICE RATE FEES, including any increases in those fees, pursuant to any RESIDENCY AGREEMENT during the CLASS PERIOD.

**RESPONSE TO NO. 7:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the term "total amount" is vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent that it seeks a response for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

1 Subject to and without waiving the foregoing objections and limitations, Brookdale responds as  
 2 follows: The total amount of basic service rate fees billed to Residents at the communities at issue for  
 3 the time period of January 1, 2015, through December 31, 2020, is \$1,728,897,630.04.

4 **INTERROGATORY NO. 8:**

5 Please state the total amount collected from or on behalf of all RESIDENTS as BASIC  
 6 SERVICE RATE FEES, including any increases, pursuant to any RESIDENCY AGREEMENT during  
 7 the CLASS PERIOD.

8 **RESPONSE TO NO. 8:**

9 Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those  
 10 objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory  
 11 that the term “total amount” is vague, ambiguous, and undefined. Brookdale further objects to this  
 12 Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the  
 13 extent that it seeks a response for each Resident, at each and every community at issue, many of which  
 14 are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to  
 15 this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R.  
 16 Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner’s Interrogatories Propounded On  
 17 Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff  
 18 Stacia Stiner’s Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories,  
 19 not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

20 Subject to and without waiving the foregoing objections and limitations, Brookdale responds as  
 21 follows: Brookdale does not record the amounts collected from or on behalf of Residents by individual  
 22 categories of fees. The total amount of payments collected from Residents at the communities at issue  
 23 for the time period of January 1, 2015, through December 31, 2020, is \$2,044,134,545.68.

24 **INTERROGATORY NO. 9:**

25 Please state the total amount billed to all RESIDENTS for PERSONAL SERVICE RATE FEES,  
 26 including any increases, pursuant to any RESIDENCY AGREEMENT during the CLASS PERIOD.



**RESPONSE TO NO. 9:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the term “total amount” is vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent that it seeks a response for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: The total amount of personal service rate fees billed to Residents at the communities at issue for the time period of January 1, 2015, through December 31, 2020, is \$369,386,381.55.

**INTERROGATORY NO. 10:**

Please state the total amount collected from or on behalf of all RESIDENTS as PERSONAL SERVICE RATE FEES, including any increases, pursuant to any RESIDENCY AGREEMENT during the CLASS PERIOD, net of any refunds.

**RESPONSE TO NO. 10:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the terms “total amount” and “refunds” are vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent that it seeks a response for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories

permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: Brookdale does not record the amounts collected from or on behalf of Residents by individual categories of fees. The total amount of payments collected from Residents at the communities at issue for the time period of January 1, 2015, through December 31, 2020, is \$2,044,134,545.68.

**INTERROGATORY NO. 11:**

Please state the total amount of FEES FOR SELECT AND THERAPEUTIC SERVICES billed to all RESIDENTS during the CLASS PERIOD.

**RESPONSE TO NO. 11:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the term "total amount" is vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent that it seeks a response for each Resident, at each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: The total amount of fees for select and therapeutic services billed to Residents at the

1 communities at issue for the time period of January 1, 2015, through December 31, 2020, is  
2 \$6,291,282.41.

3 **INTERROGATORY NO. 12:**

4 Please state the total amount of FEES FOR SELECT AND THERAPEUTIC SERVICES  
5 collected from or on behalf of all RESIDENTS during the CLASS PERIOD.

6 **RESPONSE TO NO. 12:**

7 Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those  
8 objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory  
9 that the term “total amount” is vague, ambiguous, and undefined. Brookdale further objects to this  
10 Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the  
11 extent that it seeks a response for each Resident, at each and every community at issue, many of which  
12 are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to  
13 this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R.  
14 Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner’s Interrogatories Propounded On  
15 Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff  
16 Stacia Stiner’s Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories,  
17 not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

18 Subject to and without waiving the foregoing objections and limitations, Brookdale responds as  
19 follows: Brookdale does not record the amounts collected from or on behalf of Residents by individual  
20 categories of fees. The total amount of payments collected from Residents at the communities at issue  
21 for the time period of January 1, 2015, through December 31, 2020, is \$2,044,134,545.68.

22 **INTERROGATORY NO. 16:**

23 Identify each FACILITY by its common name (as marketed to the public), legal or corporate  
24 name, address, and time period during which it was leased, owned, operated and/or managed by  
25 BROOKDALE.

**RESPONSE TO NO. 16:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks a response as to each Facility and would require Brookdale to sort through an indefinite number of records to identify the information requested in the Interrogatory for each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory to the extent that such information is publicly available or otherwise accessible to Plaintiffs. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows:

Common Name	Address	State	City	Zip Code	Legal Entity Name	Time Period
Brookdale Alhambra	1 E Commonwealth	CA	Alhambra	91801	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Anaheim	200 North Dale Avenue	CA	Anaheim	92801	Summerville at Fairwood Manor, LLC	7/31/2014 -
Brookdale Nohl Ranch (fka Brookdale Anaheim Hills)	380 S. Anaheim Hills Rd	CA	Anaheim Hills	92807	BLC Nohl Ranch LLC	6/21/2005 -
Brookdale Antelope Valley	43051 15th St W	CA	Lancaster	93534	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Apple Valley	11825 Apple Valley Rd	CA	Apple Valley	92308	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Auburn	11550 Education Street	CA	Auburn	95602	Emeritus Corporation	7/31/2014 -
Brookdale Bakersfield	8100 Westwold Drive	CA	Bakersfield	93311	Emeritus Corporation	7/31/2014 - 5/2/2019
Brookdale Brea	285 West Central Avenue	CA	Brea	92821	BREA Brea LLC	7/31/2014 -
Brookdale Brookhurst	15302 Brookhurst Street	CA	Westminster	92683	Summerville 13 LLC	7/31/2014 -
Brookdale Camarillo	6000 Santa Rosa Rd	CA	Camarillo	93012	Emeritus Corporation	7/31/2014 - 2/1/2021
Brookdale Carlsbad	3140 El Camino Real	CA	Carlsbad	92008	Emeritus Corporation	7/31/2014 - 2/1/2021
Brookdale Carmel Valley	13101 Hartfield Avenue	CA	San Diego	92130	Emeritus Corporation	7/31/2014 - 3/1/2021
Brookdale Casa Whittier	10615 Jordan Road	CA	Whittier	90603	Summerville at Cobbco, Inc.	7/31/2014 - 12/24/2015
Brookdale Central Whittier	8101 Painter Avenue	CA	Whittier	90602	BREA Whittier LLC	7/31/2014 -
Brookdale Chanate	3250 Chanate Road	CA	Santa Rosa	95404	BKD Arbors of Santa Rosa LLC	3/26/2010 -
Brookdale Chatsworth	20801 Devonshire Street	CA	Chatsworth	91311	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Cherry Hills	28333 Valley Blvd.	CA	Sun City	92586	S-H OpCo Cherry Hills, LLC	9/1/2011 - 3/23/2018
Brookdale Citrus Heights	7375 Stock Ranch Road	CA	Citrus Heights	95621	BREA Citrus Heights LLC	7/31/2014 -
Brookdale Clairemont	5219 Clairemont Mesa Boulevard	CA	San Diego	92117	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Clearlake	14789 Burns Valley Rd	CA	Clearlake	95422	HCP Clearlake OpCo LLC	7/31/2014 - 2/5/2019
Brookdale Corona	2005 Kellogg Avenue	CA	Corona	92879	Emeritus Corporation	7/31/2014 -
Brookdale Danville	400 West El Pintado Boulevard	CA	Danville	94526	Summerville at Barrington Court LLC	7/31/2014 -
Brookdale Diablo Loge (fka Brookdale Danville Diablo Road)	950 Diablo Road	CA	Danville	94526	Emeritus Corporation	7/31/2014 -
Brookdale Elk Grove	6727 Laguna Park Dr	CA	Elk Grove	95758	S-H OpCo Laguna Creek LLC	7/31/2014 - 2/1/2021
Brookdale Fairfield AL/MC (CA)	3350 Cherry Hills Court	CA	Fairfield	94534	Emeritus Corporation	7/31/2014 - 2/5/2019
Brookdale Folsom	780 Harrington Way	CA	Folsom	95630	Emeritus Corporation	7/31/2014 -
Brookdale Fortuna AL/MC (CA)	2401 Redwood Way	CA	Fortuna	95540	HCP Fortuna OpCo LLC	7/31/2014 - 2/5/2019
Brookdale Fountaingrove	300 Fountaingrove Pkwy	CA	Santa Rosa	95403	Emeritus Corporation	7/31/2014 - 6/3/2019
Brookdale Fremont	2860 Country Dr.	CA	Fremont	94536	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Fresno	1715 E. Alluvial Avenue	CA	Fresno	93720	S-H OpCo Carrington Pointe, LLC	9/1/2011 - 3/23/2018
Brookdale Garden Grove	10200 Chapman Avenue	CA	Garden Grove	92840	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Glendale	426 Piedmont Avenue	CA	Glendale	91206	Summerville at Cobbco, Inc.	7/31/2014 - 6/1/2017
Brookdale Grand Terrace	22325 Barton Road	CA	Grand Terrace	92313	Emeritus Corporation	7/31/2014 - 12/17/2019



Common Name	Address	State	City	Zip Code	Legal Entity Name	Time Period
Brookdale Greenhaven	6350 Riverside Blvd	CA	Sacramento	95831	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Hemet	1177 S Palm Ave	CA	Hemet	92543	Emeritus Corporation	7/31/2014 - 8/17/2017
Brookdale Irvine	10 Marquette	CA	Irvine	92612	BLC Inn at the Park, LLC	8/10/2005 -
Brookdale Kettleman Lane	2150 West Kettleman Lane	CA	Lodi	95242	Emeritus Corporation	7/31/2014 -
Brookdale Lodi	2220 West Kettleman Lane	CA	Lodi	95242	BLC Chancellor-Lodi LH, LLC	4/1/2007 -
Brookdale Loma Linda	25585 Van Leuven Street	CA	Loma Linda	92354	Emeritus Properties XVI, Inc.	7/31/2014 -
Brookdale Magnolia	737 Magnolia Ave	CA	Corona	92879	S-H OpCo Crown Pointe, LLC	7/31/2014 - 3/1/2021
Brookdale Manteca	430 N Union Rd	CA	Manteca	95337	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Mirage Inn	72750 Country Club Dr	CA	Rancho Mirage	92270	BLC Mirage Inn, L.P.	8/16/2005 -
Brookdale Monrovia	201 E. Foothill Blvd	CA	Monrovia	91016	BLC - Gables - Monrovia, L.P.	6/21/2005 -
Brookdale Murrieta	24350 Jackson Avenue	CA	Murrieta	92562	BLC Chancellor-Murriet LH, LLC	4/1/2007 -
Brookdale Napa	3255 Villa Lane	CA	Napa	94558	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale North Bay	2261 Tuolumne St	CA	Vallejo	94589	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale North Euclid	1031 North Euclid Avenue	CA	Ontario	91762	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale North Fremont	38035 Martha Avenue	CA	Fremont	94536	Summerville at Atherton Court LLC	7/31/2014 -
Brookdale North Tarzana	5711 Reseda Boulevard	CA	Tarzana	91356	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Northridge	17650 Devonshire St	CA	Northridge	91325	Emeritus Corporation	7/31/2014 -
Brookdale Oceanside	3524 Lake Boulevard	CA	Oceanside	92056	Emeritus Properties XVI, Inc.	7/31/2014 -
Brookdale Orange	142 South Prospect	CA	Orange	92869	Summerville at Cobbco, Inc.	7/31/2014 - 12/24/2015
Brookdale Orangevale	6125 Hazel Avenue	CA	Orangevale	95662	Summerville at Hazel Creek, LLC	7/31/2014 - 9/10/2019
Brookdale Palm Springs	1780 E Baristo Rd	CA	Palm Springs	92262	Emeritus Corporation	7/31/2014 - 6/1/2018
Brookdale Paso Robles	1919 Creston Road	CA	Paso Robles	93446	Emeritus Corporation	7/31/2014 - 2/5/2019
Brookdale Paulin Creek	2375 Range Ave	CA	Santa Rosa	95403	BLC Lodge at Paulin, Inc.	1/23/2012 -
Brookdale Rancho Mirage	72201 Country Club Dr	CA	Rancho Mirage	92270	Emeritus Corporation	7/31/2014 - 2/1/2021
Brookdale Red Bluff	705 Luther Rd	CA	Red Bluff	96080	BRE Knight SH Red Bluff LLC	7/31/2014 - 7/1/2020
Brookdale Redwood City	485 Woodside Road	CA	Redwood City	94061-3865	BLC Woodside Terrace LP	12/22/1998 -
Brookdale Riverside	5881 El Palomino Drive	CA	Riverside	92509	Summerville at Cobbco, Inc.	7/31/2014 - 5/16/2019
Brookdale Riverwalk IL/AL/MC	350 Calloway Drive	CA	Bakersfield	93312	BLC Glenwood Gardens AL-LH, LLC	4/27/2006 -
Brookdale Rohnert Park	4855 Snyder Ln	CA	Rohnert Park	94928	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Roseville	1 Somer Ridge Drive	CA	Roseville	95661	Summerville at Roseville Gardens LLC	7/31/2014 -
Brookdale Salinas	290 Regency Circle	CA	Salinas	93906	Summerville at Harden Ranch LLC	7/31/2014 -
Brookdale San Dimas	1740 San Dimas Avenue	CA	San Dimas	91773	Emeritus Corporation	7/31/2014 - 8/1/2020
Brookdale San Jose	1009 Blossom River Way	CA	San Jose	95123	BLC - Atrium at San Jose LP	1/29/2015 -

Common Name	Address	State	City	Zip Code	Legal Entity Name	Time Period
Brookdale San Juan Capistrano	31741 Rancho Viejo Road	CA	San Juan Capistrano	92675	Emeritus Corporation	7/31/2014 - 2/1/2021
Brookdale San Marcos	1590 W. San Marcos Blvd	CA	San Marcos	92078	BLC Brookdale Place of San Marcos, LP	12/26/2000 -
Brookdale San Pablo	13956 San Pablo Avenue	CA	San Pablo	94806	Summerville at Cobbco, Inc.	7/31/2014 - 7/15/2020
Brookdale San Ramon	18888 Bollinger Canyon Rd	CA	San Ramon	94583	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Ocean House (fka Brookdale Santa Monica)	2107 Ocean Ave	CA	Santa Monica	90405	BLC - Ocean House, L.P.	7/22/2005 -
Brookdale Santa Monica Gardens	851 Second Street	CA	Santa Monica	90403	BLC Gardens - Santa Monica LH, LLC	4/27/2006 -
Brookdale Scotts Valley	100 Lockwood Lane	CA	Scotts Valley	95066	BLC Oak Tree Villa Inc.	6/21/2005 -
Brookdale Sonoma	800 Oregon St	CA	Sonoma	95476	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Gardens of Tarzana (fka Brookdale South Tarzana)	18700 Burbank Boulevard	CA	Tarzana	91356	BLC G.T., Inc. as GP for BLC Gardens-Tarzana, LP	6/30/2006 -
Brookdale Sterling Court	100 Sterling Ct	CA	Roseville	95661	S-H OpCo The Palms LLC	7/31/2014 - 2/1/2021
Brookdale Stock Ranch Road	7418 Stock Ranch Rd.	CA	Citrus Heights	95621	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Stockton	6725 Inglewood Ave	CA	Stockton	95207	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Sunwest IL/AL/MC	1001 N Lyon Ave	CA	Hemet	92545	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Tracy	355 West Grant Line Road	CA	Tracy	95376	Summerville at Heritage Place LLC	7/31/2014 -
Brookdale Uptown Whittier	13250 Philadelphia St	CA	Whittier	90601	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Vacaville	1111 Ulatis Drive	CA	Vacaville	95687	Emeritus Corporation	7/31/2014 - 5/2/2019
Brookdale Vacaville LeisureTwn	799 Yellowstone Dr	CA	Vacaville	95687	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Vallejo Hills	350 Locust Dr.	CA	Vallejo	94591	Summerville at Cobbco, Inc.	7/31/2014 - 2/5/2019
Brookdale Valley View	5900 Chapman Avenue	CA	Garden Grove	92845	Summerville at Cobbco, Inc.	7/31/2014 -
Brookdale Walnut	19850 Golden Springs Drive	CA	Walnut	91789	Summerville 8, LLC	7/31/2014 -
Brookdale Windsor	907 Adele Drive	CA	Windsor	95492	Chancellor Windsor, LLC	4/1/2007 -
Brookdale Yorba Linda	17803 Imperial Hwy	CA	Yorba Linda	92886	Emeritus Corporation	7/31/2014 - 8/1/2020
Brookdale Yreka	351 Bruce St	CA	Yreka	96097	HCP Yreka OpCo	7/31/2014 - 2/5/2019
Cortona Park, CA	150 Cortona Way	CA	Brentwood	94513	BKD Cortona Park, LLC	9/9/2010 -

**INTERROGATORY NO. 17:**

For each FACILITY, identify the district, region, and division within Brookdale's organizational structure to which the FACILITY is assigned.

**RESPONSE TO NO. 17:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory that the terms "district," "region," and "division" are vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks a response as to each Facility and would require Brookdale to sort through an indefinite number of records to identify the information requested in the Interrogatory for each and every community at issue, many of which are no longer affiliated with Brookdale, over the course of the class period. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner's Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts, for a total of 25 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows:

Community Name	Division Report Code	Regional Report Code	District Report Code
Brookdale Alhambra	DV02	DV02R06	DV02R06D08
Brookdale Anaheim	DV02	DV02R06	DV02R06D04
Brookdale Auburn	DV02	DV02R06	DV02R06D05
Brookdale Brea	DV02	DV02R06	DV02R06D04
Brookdale Brookhurst	DV02	DV02R06	DV02R06D04
Brookdale Central Whittier	DV02	DV02R06	DV02R06D04
Brookdale Chanate	DV02	DV02R06	DV02R06D01
Brookdale Chatsworth	DV02	DV02R06	DV02R06D08
Brookdale Citrus Heights	DV02	DV02R06	DV02R06D05
Brookdale Clairemont	DV02	DV02R06	DV02R06D03
Brookdale Corona	DV02	DV02R06	DV02R06D03
Brookdale Danville	DV02	DV02R06	DV02R06D05
Brookdale Diablo Lodge	DV02	DV02R06	DV02R06D05
Brookdale Folsom	DV02	DV02R06	DV02R06D05
Brookdale Garden Grove	DV02	DV02R06	DV02R06D04
Brookdale Gardens of Tarzana	DV02	DV02R06	DV02R06D08
Brookdale Irvine	DV02	DV02R06	DV02R06D04
Brookdale Kettleman Lane	DV02	DV02R06	DV02R06D01
Brookdale Lodi	DV02	DV02R06	DV02R06D01
Brookdale Loma Linda	DV02	DV02R06	DV02R06D03
Brookdale Mirage Inn	DV02	DV02R06	DV02R06D03
Brookdale Monrovia	DV02	DV02R06	DV02R06D08
Brookdale Murrieta	DV02	DV02R06	DV02R06D03
Brookdale Napa	DV02	DV02R06	DV02R06D01
Brookdale Nohl Ranch	DV02	DV02R06	DV02R06D04
Brookdale North Euclid	DV02	DV02R06	DV02R06D04
Brookdale North Fremont	DV02	DV02R06	DV02R06D05
Brookdale North Tarzana	DV02	DV02R06	DV02R06D08
Brookdale Northridge	DV02	DV02R06	DV02R06D02
Brookdale Ocean House	DV02	DV02R06	DV02R06D08
Brookdale Oceanside	DV02	DV02R06	DV02R06D03
Brookdale Paulin Creek	DV02	DV02R06	DV02R06D01
Brookdale Redwood City	DV02	DV02R06	DV02R06D01
Brookdale Riverwalk IL/AL/MC	DV02	DV02R06	DV02R06D02
Brookdale Roseville	DV02	DV02R06	DV02R06D05
Brookdale Salinas	DV02	DV02R06	DV02R06D01
Brookdale San Jose	DV02	DV02R06	DV02R06D05
Brookdale San Marcos	DV02	DV02R06	DV02R06D03
Brookdale San Ramon	DV02	DV02R06	DV02R06D05
Brookdale Santa Monica Gardens	DV02	DV02R06	DV02R06D08
Brookdale Scotts Valley	DV02	DV02R06	DV02R06D01
Brookdale Sunwest IL/AL/MC	DV02	DV02R06	DV02R06D03
Brookdale Tracy	DV02	DV02R06	DV02R06D01
Brookdale Uptown Whittier	DV02	DV02R06	DV02R06D04
Brookdale Valley View	DV02	DV02R06	DV02R06D04
Brookdale Walnut	DV02	DV02R06	DV02R06D04
Brookdale Windsor	DV02	DV02R06	DV02R06D01
Cortona Park, CA	DV02	DV02R06	DV02R06D01

**INTERROGATORY NO. 23:**

Please identify the meaning of the data field entitled “Rounded\_Hours” as it appears in the timekeeping/payroll data produced by YOU as BKD1384958 through BKD1284975 and the source and calculation of the data entries for that field.

**RESPONSE TO NO. 23:**

Brookdale incorporates its Objections To All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale objects to this Interrogatory that the phrases “source and calculation” and “data entries for that field” are vague, ambiguous, and undefined. Brookdale further objects to this Interrogatory because Plaintiffs have exceeded the number of Interrogatories permitted by Fed. R. Civ. P. 33(a)(1) without leave of Court. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set One, Plaintiffs served 11 interrogatories, not including discrete subparts. In Plaintiff Stacia Stiner’s Interrogatories Propounded On Defendants, Set Two, Plaintiffs served 14 interrogatories, not including discrete subparts.

Subject to and without waiving the foregoing objections and limitations, Brookdale responds as follows: The “Rounded\_Hours” field represents the total hours that were paid for the duration of time between the “Rounded\_Start” and “Rounded\_End” fields in the Kronos timekeeping platform.

DATED: April 23, 2021

SEYFARTH SHAW LLP

By: /s/ Gerald L. Maatman, Jr.  
Gerald L. Maatman, Jr.

Attorneys for Defendants  
BROOKDALE SENIOR LIVING, INC.  
AND BROOKDALE SENIOR LIVING  
COMMUNITIES, INC.



**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2021, a copy of the foregoing Defendants' Supplemental Responses To Plaintiff Helen Carlson's Interrogatories, Set One, was served via email on the parties listed below.

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By: /s/ Gerald L. Maatman, Jr.  
Gerald L. Maatman, Jr.

# **Exhibit 3**

**SEYFARTH SHAW LLP**

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Attorneys for Defendants

BROOKDALE SENIOR LIVING, INC. and

BROOKDALE SENIOR LIVING COMMUNITIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

STACIA STINER, et al.,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;  
BROOKDALE SENIOR LIVING  
COMMUNITIES, INC.; and DOES 1 through 100,

Defendants.

Case No. 4:17-cv-03962-HSG

**DEFENDANTS' SUPPLEMENTAL  
RESPONSES TO PLAINTIFF STACIA  
STINER'S INTERROGATORIES, SET  
ONE**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Brookdale Senior Living, Inc. and Brookdale Senior Living Communities, Inc. ("Brookdale"), by and through their attorneys, Seyfarth Shaw LLP, hereby submit their Supplemental Responses and Objections ("Responses") to Plaintiff Stacia Stiner's Interrogatories Propounded on Brookdale, Set One ("Interrogatories").

### **PRELIMINARY STATEMENT**

Brookdale makes these Responses to the Interrogatories expressly reserving and without waiver of: (a) all rights to object on the basis of competency, relevance, materiality, confidentiality, authenticity, privilege, or any other proper grounds to the use of any of Brookdale's responses or objections to the Interrogatories, any information contained therein, or any documents produced in response to the Interrogatories, as evidence, in whole or in part, in any subsequent proceeding, action, or matter, or in any trial in this or any other action; (b) all rights to object on any ground and at any time to a demand or request for further response to the Interrogatories, other discovery requests, or proceedings involving or related to the subject matter of the Interrogatories, information, or documents Brookdale has provided or may provide in response to the Interrogatories; and (c) the right at any time to review, revise, correct, add to, supplement, amend, or clarify any of the responses propounded herein.

Brookdale has not yet completed its discovery and investigation of the facts pertaining to the above-captioned action, review of its own documents, or trial preparation. Brookdale bases its responses and objections on information now known to Brookdale. Brookdale reserves the right to rely on any facts or other evidence that may develop or come to its attention at a later date.

These Responses are subject to amendment and supplementation as Brookdale acquires additional information and completes its review and analysis. Brookdale's Responses to the Interrogatories were prepared in consultation with its attorneys and may not exactly match the words or phrases that might be used by individual employees in the course of this litigation to describe events, policies, or matters discussed herein.

**OBJECTIONS TO ALL INTERROGATORIES**

1  
2 1. Brookdale objects to the Interrogatories as overly broad, unduly burdensome, and not  
3 proportionate to the needs of this case to the extent that they seek documents and information from each  
4 and every community that Brookdale has operated in California. Brookdale has operated approximately  
5 90 communities in California over the course of just the past six years, and producing all information  
6 related to these Interrogatories for all communities, many of which are no longer affiliated with  
7 Brookdale, would impose an unreasonable burden.

8 2. Brookdale objects to the Interrogatories to the extent they seek work product, trial  
9 preparation materials, identification of documents prepared after the commencement of this litigation,  
10 communications protected from disclosure by the attorney-client privilege, or documents protected from  
11 disclosure by any applicable law, rule, privilege or immunity. Nothing contained in these Responses is  
12 intended to or may be construed as a waiver of the attorney-client privilege, the work product doctrine,  
13 or any other applicable law, rule, or privilege.

14 3. Brookdale objects to the Interrogatories, and to the definitions and instructions  
15 accompanying the Interrogatories, to the extent they seek or purport to impose definitions, instructions,  
16 or obligations outside of those imposed by Rules 26 and 33 of the Federal Rules of Civil Procedure, the  
17 Local Civil Rules of this Court, or the Orders of this Court. Brookdale will respond to the  
18 Interrogatories in accordance with its obligations as set forth in those Rules and/or Orders.

19 4. Brookdale objects to the Interrogatories to the extent that they seek trade secrets and/or  
20 confidential and/or proprietary business information.

21 5. Brookdale objects to the Interrogatories to the extent that they seek information that is  
22 publicly available or otherwise accessible to Plaintiffs.

23 6. Brookdale objects to the Interrogatories to the extent that they fail to identify the  
24 information to be produced with reasonable particularity. Brookdale responds to each of the individual  
25 Interrogatories as it understands and interprets each Interrogatory. Brookdale reserves the right to  
26 amend or supplement these responses in the event that Plaintiffs later assert a different interpretation that  
27 is accepted by Brookdale.



7. Brookdale objects to the definition of the terms “ANY” and “ALL” as overbroad, unduly burdensome, vague, indefinite, ambiguous, and not proportionate to the legitimate discovery needs of the case. Plaintiffs’ definition of these terms requires a simultaneously expansive and restrictive reading of both. Brookdale construes “any” and “all” as they are commonly understood in ordinary English.

8. Each and every answer is made subject to the foregoing general objections and to any protective order entered by the Court, regardless of whether a general or specific objection is stated in the answer to the particular Interrogatory, and Brookdale does not waive any general objections not referred to in any particular answer.

9. Brookdale reserves the right to supplement its Responses with information or documents that come to its attention or become available after service of these Responses and to use such information at any hearing or proceeding, including the trial of this or any other action.

#### **SUPPLEMENTAL RESPONSES TO PLAINTIFF’S INTERROGATORIES**

##### **INTERROGATORY NO. 9:**

Please identify ANY and ALL FACILITIES that were constructed for first occupancy after January 26, 1993.

##### **RESPONSE:**

Brookdale incorporates its Objections to All Interrogatories, and Plaintiffs should read those objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory as unduly burdensome and harassing, as it is duplicative of Request for Production No. 14, Set Two. Brookdale further objects to this Interrogatory to the extent that it calls for a legal and/or expert opinion and/or conclusion as to what might constitute construction “for first occupancy.”

Brookdale responds as follows: Subject to the foregoing objections and limitations, and pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Brookdale hereby refers Plaintiffs to Bates Nos. BKD00004402 to 4768, 5214 to 7369, 7889 to 16799, and 16883 to 18254, which were provided to Plaintiffs on May 21, 2019, and contain information responsive to this Interrogatory.

Brookdale further states that the following communities were constructed after January 26, 1993: Bakersfield; Brookhurst; Carlsbad; Carmel Valley; Citrus Heights; Cortona Park; Danville; Elk Grove;

1 Fountaingrove; Hemet; Kettleman Lane; Lodi; Mirage Inn; Murrieta; North Fremont; Northridge; Paso  
2 Robles; Red Bluff; Riverwalk; Roseville; Salinas; San Dimas; San Juan Capistrano; Sterling Court;  
3 Vacaville; Windsor; and Yorba Linda.

4 **INTERROGATORY NO. 10:**

5 Please identify ANY and ALL FACILITIES that were ALTERED after January 26, 1992.

6 **RESPONSE:**

7 Brookdale incorporates its Objections to All Interrogatories, and Plaintiffs should read those  
8 objections as if they were re-written in this Response. Brookdale further objects to this Interrogatory as  
9 unduly burdensome and harassing, as it is duplicative of Request for Production No. 14, Set Two.  
10 Brookdale further objects to Plaintiffs' definition of "ALTERATION" or "ALTERED" as overbroad,  
11 vague, and unduly burdensome, as the definition requires speculation as to what might constitute "a  
12 change to a building or facility that affects or could affect the usability of the building or facility or  
13 portion thereof." Brookdale further objects to this Interrogatory to the extent that it calls for a legal  
14 and/or expert opinion and/or conclusion as to what might constitute an "ALTERATION" or being  
15 "ALTERED."

16 Brookdale responds as follows: Subject to the foregoing objections and limitations, and pursuant  
17 to Rule 33(d) of the Federal Rules of Civil Procedure, Brookdale hereby refers Plaintiffs to Bates Nos.  
18 BKD00004402 to 4768, 5214 to 7369, 7889 to 16799, and 16883 to 18254, which were provided to  
19 Plaintiffs on May 21, 2019, and contain information responsive to this Interrogatory.

20 Brookdale further states that following a diligent search and reasonable inquiry, Brookdale has  
21 not identified any information for a supplemental response to this Interrogatory.

1 DATED: January 22, 2021

SEYFARTH SHAW LLP

3 By: /s/ Gerald L. Maatman, Jr.

4 Gerald L. Maatman, Jr.

5 Attorney for Defendants  
6 BROOKDALE SENIOR LIVING, INC.  
7 AND BROOKDALE SENIOR LIVING  
8 COMMUNITIES, INC.  
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# **Exhibit 4**

**Mark T. Johnson**

---

**From:** Kopczynski, Jeffrey A. N. <jkopczynski@omm.com>  
**Sent:** Thursday, March 12, 2020 7:53 AM  
**To:** Mark T. Johnson  
**Cc:** Guy B. Wallace; Travis Close; Gay C. Grunfeld; Barker, Jeffrey A.; Powers, Matt; Buffaloe, William  
**Subject:** Stiner -- Suspension of Inspections

Dear Mark:

As you know, California declared a state of emergency on March 5 in response to the coronavirus threat, which, as of yesterday, the World Health Organization officially classified as a pandemic. According to the CDC, older adults with underlying chronic medical conditions—i.e., many residents of Brookdale communities—are at the “highest risk of being affected by COVID-19,” including fatalities. As a result, assisted living and elder care communities throughout the country are, for the protection of their residents, implementing strict guidelines limiting access by non-essential third parties who are not necessary for operation of the facilities or to meet resident needs (including vendors, visitors, and, in some circumstances, even family members). Following the guidance of public health officials, Brookdale has implemented strict access policies for communities in California.

Until the public health crisis stabilizes, we do not have physical access to any communities and therefore need to temporarily cancel any further inspections. We will let you know as soon as we are able to discuss a timetable for rescheduling those inspections.

Jeff

**O'Melveny**

**Jeffrey A. N. Kopczynski**

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O'Melveny & Myers LLP

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New York, NY 10036

[Website](#) | [LinkedIn](#) | [Twitter](#)



# **Exhibit 5**

**Filed Conditionally Under Seal**

# **Exhibit 6**

**Filed Conditionally Under Seal**

# **Exhibit 7**

**Filed Conditionally Under Seal**

# **Exhibit 8**

**Filed Conditionally Under Seal**

# **Exhibit 9**

**Filed Conditionally Under Seal**



# **Exhibit 10**

**Filed Conditionally Under Seal**

# **Exhibit 11**

**Filed Conditionally Under Seal**

# **Exhibit 12**

••• SCHNEIDER WALLACE  
COTTRELL KONECKY  
WOTKYNs

March 3, 2017

**VIA U.S.P.S CERTIFIED MAIL**

Shawn Cull  
Interim Assistant Executive Director  
Brookdale San Ramon  
18888 Bollinger Canyon Road  
San Ramon, CA 94583

Chad C. White  
General Counsel  
Brookdale Senior Living Communities, Inc.  
111 Westwood Place, Suite 400  
Brentwood, TN 39027

**Re: *Brookdale San Ramon***  
***Notice Pursuant to Cal. Civ. Code § 1782***



Dear Mr. Cull and Mr. White:

I write on behalf of Ms. Sharon Eidler and a group of current and former residents of Brookdale Senior Living San Ramon. We understand from Ms. Eidler and the residents that during the past year they have met with Brookdale San Ramon and its representatives to raise serious concerns about the conditions at Brookdale San Ramon, and how those conditions are negatively impacting the residents.

Since Brookdale Senior Living ("Brookdale") took over the management of the San Ramon facility from Merrill Gardens, care for the residents has become substantially worse, but the residents are charged higher amounts for services. At the time of the takeover from Merrill Gardens, Brookdale made representations to the existing residents that the service and conditions at the facility would remain the same or improve. The opposite has been true. Service, reliability and quality have worsened in all of the following areas: staffing/care, food and food service, housekeeping and laundry, activities, and transportation. Despite the severe decline in the quality of these vital services, Brookdale has instituted significant annual increases in the monthly base rent and personal service rates. It has also increased personal service rates on residents that it contends are due to increased personal care needs, yet residents have seen no increase in care. This letter will review the major deficiencies in each of these essential areas of care in turn, and then set forth the changes that must be made by Brookdale.

First, Brookdale San Ramon is chronically understaffed. As a result, residents either do not receive the paid-for services, or run the risk that they will not receive the services for which they are paying on any given day. The lack of sufficient staff at Brookdale means that residents who pay for assistance with showering, dressing, brushing their teeth, toileting, and other hygiene assistance do not receive it on a routine basis. Scheduled showers are routinely skipped

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by staff who do not have time to bath residents. Worse, staff often leave residents unattended on the commode because another resident has pushed their call button and there is no one else available to respond. Residents have been left on their bed undressed by staff called away to attend to other residents in need. Residents who need assistance getting to the bathroom often wait for long periods of time for staff to respond to their call buttons. Their choice is to risk a fall by going to the bathroom without help or to go to the bathroom on themselves. They wait for inordinate amounts of time for someone to help them change out of soiled briefs, raising the risk of urinary tract infections and decubitus ulcers. Brookdale's failure to hire sufficient staff to help residents with these routine hygiene tasks has put residents in humiliating, distressing and dangerous situations. Further, the inadequate staffing of Brookdale San Ramon also results in residents who pay for medication administration receiving those medications hours after they are scheduled.

Second, food quality, preparation, and service have plummeted since Brookdale took over the San Ramon care facility. The staffing shortage in the dining department causes residents to wait for long periods of time to be served. Food is served cold, and residents do not dare to make a special request, for fear that the wait will be extreme. The food quality has so deteriorated that it is in many cases nearly inedible. At least one resident has encountered food in the dining room that is past its expiration date. The long waits and substandard meals in the dining room mean that residents often forgo meals altogether. Residents have made numerous complaints to Brookdale about the dining service, individually and through the family and resident councils.

Third, the base rate for the residents' services from Brookdale includes payment for weekly laundry, room cleaning, and activities. These things, however, are not being provided in a reliable manner. Laundry is not washed or is lost. Residents' rooms have been left in deplorable and often unsanitary conditions. Activities are regularly cancelled. Wheelchair users who require transportation off site have regularly been denied this service because the facility does not have accessible transportation, imposes a limit of two wheelchair users per trip, and requires that these residents with disabilities be accompanied by a family member or a paid one-on-one chaperone. As discussed below, these limitations violate disability rights laws.

Fourth, many residents rely on Brookdale for transportation to medical and lab appointments, church, and activities. Brookdale promised its residents that such transportation would be provided, and indeed, this is something the residents pay for. However, Brookdale San Ramon has gone for long stretches without a dedicated driver, and relies on an already stretched-thin staff to provide this transportation, if at all. On several occasions residents have been left waiting outside of a medical office or a church for Brookdale staff who forgot to pick them up.

Fifth, residents are charged a monthly fee for a pendant they wear that Brookdale has represented will alert staff if they have an emergency and push the pendant button. Brookdale has represented to residents that the staff will immediately respond to these pendant buttons to provide assistance. These pendants are unreliable and do not notify staff of the resident's location should they not be in their room.

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Sixth, Brookdale has violated the Americans with Disabilities Act (“ADA”) and parallel federal and state disability civil rights statutes by failing to provide full and equal access to its facilities and services. Brookdale’s residents’ rooms do not meet federal or state accessibility standards. Under Title III of the ADA, fifty percent of the residential rooms in long-term care facilities must meet enumerated access standards. Brookdale San Ramon clearly does not meet these standards. Wheelchair users are placed in rooms that do not have sufficient turning space in the bathrooms or the bedroom area. There is no clearance for their wheelchairs under the sinks, preventing residents from using them. The grab bars that do exist in the bathrooms are not compliant, and there are no roll-in showers. There are barriers to using the outdoor space, including hard-to-open sliding doors, a lip at the threshold of the door, and insufficient space to accommodate a wheelchair. The closets do not have accessible hanging and storage space. These access violations prevent residents from having full and equal access to their rooms, thus denying them full and equal access to Brookdale’s services.

Moreover, many residents with mobility disabilities need and have paid for assistance to move about the facility. They need help getting to the dining room, other common rooms, and activities. Yet, they often sit in their rooms, segregated from the other residents and unable to participate in Brookdale San Ramon’s programs, services and activities because Brookdale does not provide sufficient staff to ensure that they get that assistance. Further, as described above, Brookdale imposes limitations and requirements that prevent wheelchair users from going on activities including limiting the number to two wheelchair users that can go on a trip and requiring that wheelchair users bring along a family member or pay for a one-to-one escort in order to participate. Brookdale’s failure to provide sufficient staffing to assist residents with their care needs and with activities constitutes discrimination on the basis of disability, as residents are unable to enjoy full and equal access to the facility’s programs, services and activities. This is especially egregious given that residents are paying Brookdale a premium for the very services it has failed to provide them. Residents have repeatedly asked Brookdale to modify its policy of staffing the facility with a skeleton crew, but in violation of 42 U.S.C. § 12182 (b)(2)(A)(ii), 42 U.S.C. § 3604(f)(3)(B) and Cal. Civ. Code § 51(f), Brookdale has failed to do so.

In summary, the circumstances described above constitute clear health and safety hazards. In those and many other instances, residents do not receive the assistance they need and for which they pay Brookdale. Residents chose to move into Brookdale because they need assistance with various activities of daily living, and it is obvious that making dependent seniors and persons with disabilities wait for assistance that comes late, if at all, creates enormous safety hazards. Residents have already been injured. It is only a matter of time before someone dies, not of natural causes, but as a result of Brookdale’s understaffing of the facility.

Please be advised that this letter constitutes 30-day notice pursuant to Cal. Civ. Code § 1782 regarding numerous misrepresentations made by Brookdale Senior Living to its current and former residents regarding staffing levels; resident safety; food quality, availability and service; pendant reliability and responsiveness of staff to pendants; calculation and billing of base and



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personal service rates; quality and provision of care and services for which the residents have paid; responsiveness; cleanliness, sanitation and overall condition of the facilities; and availability of activities. Additionally, Brookdale has committed elder financial abuse in violation of Cal. W&I code § 15610.30, which prohibits taking, secreting, appropriating, obtaining or retaining the personal property of an elder or a dependent adult “for a wrongful use or with intent to defraud, or both.” W&I Code § 15610.30(a)(1).

In addition, this letter serves as notice that Brookdale has violated and continues to violate, among other laws, Title III of the ADA; the Fair Housing Act Amendments of 1988 (“FHAA”); the Unruh Civil Rights Act (Cal. Civ. Code § 51 et seq.); California’s Elder Abuse and Dependent Adult Civil Protection Act (Cal. Civ. Code § 15610 et seq.); and Cal. B&P Code § 17200 et seq.

During the course of the past year, Brookdale residents and their family members have brought these and other violations to the attention of Brookdale management, both at the facility and at higher levels within the organization. Ms. Eidler and the other family members and residents have made numerous good faith efforts to resolve these important issues without undertaking litigation. However, Brookdale has done nothing to change its policies and practices so that sufficient access to care, services and facilities are provided to its residents at its San Ramon facility. Accordingly, the residents request that Brookdale enter into a legally binding settlement agreement containing the following requirements:

1. A staffing plan that ensures that residents will receive the services for which they have paid in a timely and effective manner, including increased staff training and budgeting the funds necessary to implement the plan;
2. Additional staffing in the dining room to ensure timely and responsive service and a plan for improving the quality of the food served, including budgeting the funds necessary;
3. Hiring one or more designated van drivers so that residents can rely on the transportation necessary to take them to appointments, church, grocery shopping, activities, and other trips;
4. Acquisition of sufficient numbers of vehicles meeting federal and state accessibility standards, so as to permit wheelchair users and other residents with mobility disabilities to safely use the transportation available to residents without disabilities;
5. Immediate cessation of the two-person limit for wheelchair users on activity outings, as well as the requirement that wheelchair users must be accompanied by a family member or paid assistant;
6. Permission for a disability access expert of our choosing to conduct a site inspection in order to determine which parts of the facility fail to meet federal or state disability

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access requirements and a commitment by Brookdale to undertake the changes necessary to bring the facility into compliance with those standards;

7. Relocation of residents with mobility disabilities to rooms that meet state and federal accessibility standards and/or modification of resident rooms to meet those standards;
8. Immediate cessation of the policy of charging residents in excess of market rate for their rooms; and
9. Payment of appropriate damages to the residents.

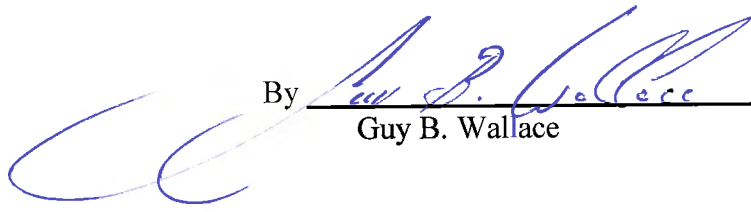
The foregoing agreement, of course, will need to be set forth in the form of a binding settlement agreement that can be enforced in court. Further, any such settlement agreement must contain affirmative assurances by Brookdale that it will not retaliate against any of the residents or their family members or caregivers in any way because they have asserted their rights under California and federal law.

Please provide us with Brookdale's response within thirty days of the date of this letter. In the event that Brookdale Senior Living is unable or unwilling to enter into a binding settlement agreement that provides the foregoing relief, our clients will have no alternative but to pursue all available legal remedies.

Please do not hesitate to contact me if you have any questions or concerns about any of the foregoing.

SCHNEIDER WALLACE  
COTTRELL KONECKY  
WOTKYNS, LLP

By

  
Guy B. Wallace

cc: Kathryn A. Stebner, Esq. (email only)  
Kelly J. Knapp, Esq. (email only)

# **Exhibit 13**

**Filed Conditionally Under Seal**

# **Exhibit 14**

**Filed Conditionally Under Seal**

# **Exhibit 15**

**Filed Conditionally Under Seal**

# **Exhibit 16**

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